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ABSTRACT

Presented are the Montgomery County Intermediate Unit 23 (Pennsylvania) 1975 policy statements and subsequent clarification on collection, maintenance, and dissemination of pupil records in special education. Outlined are procedures for information collection, data classification and maintenance, administration of security, and information dissemination. Sample consent forms are also provided for parents of children in 10 different special class programs. The second pamphlet contains clarifications on such matters as information request procedures, inactive folders, and release of student records. Among 18 appendixes are sample forms for completion by record collections supervisors, parental release of information and a listing for parents of outside agency documents. (CL)

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PRINCIPLES FOR COLLECTION, MAINTENANCE, AND DISSEMINATION OF PUPIL RECORDS

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DIVISION OF PSYCHOLOGICAL SERVICES

ADOPTED AUGUST 27, 1975
MONTGOMERY COUNTY INTERMEDIATE UNIT SCHOOL BOARD

APPROVED SEPTEMBER 15, 1975
PENNSYLVANIA DEPARTMENT OF EDUCATION

ISSUED BY
MONTGOMERY COUNTY INTERMEDIATE UNIT 23
1605-B WEST MAIN STREET
NORRISTOWN, P.A. 19401

MONTGOMERY COUNTY
INTERMEDIATE UNIT
PRINCIPLES FOR
COLLECTION, MAINTENANCE, AND
DISSEMINATION OF PUPIL RECORDS

The Montgomery County Intermediate Unit provides special education classroom programs, resource room programs, itinerant services, and consultative services for children in the public school systems of Montgomery County. Information concerning the child's academic progress, level of intellectual functioning, emotional and health studies, and family background is routinely gathered in order to provide appropriate instruction and supportive services for each student. While this information may be essential to insure the best possible program for each student, steps must be taken to guarantee that this information will not constitute an invasion of privacy of students and their parents or guardians and to guarantee that this information will be used only for valid educational purposes.

These proposed principles for the management of school records are based upon Guidelines for the Collection, Maintenance, and Dissemination of Pupil Records published by the Pennsylvania Department of Education, Bureau of Instructional Support Services, Division of Pupil Personnel Services (August, 1974) and specify conditions for gathering, maintaining, and releasing information concerning students receiving services from the Montgomery County Intermediate Unit, Special Education Division.

COLLECTION OF INFORMATION CONCERNING STUDENTS
IN MONTGOMERY COUNTY INTERMEDIATE UNIT
SPECIAL EDUCATION PROGRAMS

I. No information concerning a student, his parents, guardians, or family will be collected without prior informed consent as specified in the following:

A. The Montgomery County Intermediate Unit Board of School Directors as elected representatives of the constituent school districts of the Montgomery County Intermediate Unit and of the residents of those school districts may provide consent for the gathering of certain types of information as specified below. Such representational consent will suffice in lieu of student, parental, guardian's or surrogate's consent for the collection of the following types of information:

1 Name, address, phone number of student

2 Parents' or guardian's or surrogate's name, address, phone number, place of work

3 Scores of group aptitude and achievement tests

4 Grades on teacher prepared tests relating to subject matter curriculum

5 Grades on report cards

6 Vocational skill assessment

7 Such other information that is routinely collected and deemed necessary by the Executive Director or his designee

B. When representational consent as specified in I-A is provided by the Montgomery County Intermediate Unit Board of School Directors, students and parents or guardians or surrogates must be notified in writing of such representational consent provided by the Montgomery County Intermediate Unit Board of School Directors. Students and their parents or guardians or surrogates must be afforded the right to appeal the decision of such representational consent. The appeal will be directed to a quasi-judicial panel specified in Administration of Security, III. When such representational consent is provided by the Montgomery County Intermediate Unit and of the residents of those school districts in lieu of individual consent, students who have

reached eighteen years of age or are less than eighteen and married or their parents, guardians, or surrogates will be notified annually of representational consent for gathering specific types of information as specified in I-A prior to the gathering of such information.

C. When the student reaches the age of eighteen, or is less than eighteen and is married, his or her informed consent alone must be obtained. This includes the right to deny parental access to records.

D. When the student is less than eighteen years of age, informed consent of the student's parent(s) or guardian(s) or surrogate(s) must be obtained.

E. The prior informed consent of students who have reached the age of eighteen, or who are less than age eighteen and married, or their parent(s) or guardian(s) or surrogate(s), not representational consent as specified in I-A, must be provided for the gathering of the following types of information under the supervision of a certified school psychologist:

1 Individual intelligence tests administered by a certified school psychologist
2 Personality tests and inventories administered by a certified school psychologist
3 Interest inventories
4 Family background information
5 When necessary, interviews by school psychologists, guidance counselors, social workers, and psychiatrists
6 Reports of agencies and practitioners outside the educational system

F. When the child has reached eighteen years of age or is less than age eighteen and married, and when the child's teacher, special education supervisor, the intermediate Unit school psychologist responsible for the child in conjunction with a coordinator of psychological services have behavioral observations that lead to

a reasonable doubt about the student's emotional or mental capacity to understand the implications of his/her giving consent for gathering information, the parents or guardians or surrogates of the student should provide individual informed consent in writing.

G. When the gathering of information is necessary for immediate need of intervention and when the student who has reached age eighteen or is less than eighteen years of age and married refuses to provide consent, written consent should be sought from the student's parent or guardian or surrogate. The necessity for "immediate needed intervention" should be construed to mean intervention to prevent the student from harming himself or others in the school situation or intervention necessary for the immediate health of the student.

H. If written individual consent is not provided by either the student or his/her parent or guardian or surrogate, further steps to gather information upon which provision of intervention is contingent should be initiated only if all of the following conditions are met:

1 The school psychologist in consultation with a coordinator of psychological services and the Director of Special Education, giving full attention to the privacy interests involved, decides that intervention is imperative. Imperative intervention is defined in G above.

2 Both the student and his/her parents or guardians or surrogates have been fully informed by certified letter and personal or telephone contact that such information will be gathered; and

3 The Director of Special Education and the Intermediate Unit Executive Director have provided consent; and

4 The student and his/her parents or guardians or surrogates are given the right to challenge the validity of the information gathered.

i. Where information is to be collected for non-school purposes either by school personnel or personnel outside the educational system, as in the case where it is proposed that the student population be used as subjects in medical or social science research studies, then the above recommendations for collection of data should be fully applied, with the further provisions of prior permission from the Intermediate Unit Executive Director and the Intermediate Unit Director of Special Education and prior informed consent from the students who have reached age eighteen or are less than eighteen and married or their parents, guardians, or surrogates. Such information is collected under conditions of anonymity as defined in Dissemination of Information Regarding Pupils, VIII. This fact should not relieve the collecting non-school agency of the obligation to obtain appropriate written informed consent from students if they have reached age eighteen or if they are less than eighteen years of age and married or their parents or guardians or surrogates.

1 Such informed consent must be provided prior to information collection.

2 The Intermediate Unit Executive Director and the Director of Special Education must review instruments and procedures to determine whether instruments or methods of inquiry constitute a significant potential invasion of privacy. The Intermediate Unit Executive Director and the Director of Special Education may conclude that to gather such information requires individual written informed consent instead of consent provided by the Montgomery County Intermediate Unit Board of School Directors as representatives of students who have reached eighteen years of age or who are less than age eighteen and married or their parents or guardians or surrogates.

J. Student information gathered for a specific purpose may be used for no other purpose unless appropriate representational consent as defined in I-A or individual consent as specified in I-D is obtained. Exceptions to this are specified under Dissemination of Information Regarding Pupils.

CLASSIFICATION AND MAINTENANCE OF DATA

The Intermediate Unit maintains a variety of types of information on each student ranging in sensitivity from the student's name and address to detailed reports of emotional status and family background. Such information also greatly varies in terms of verification of information. Differing regulations are established to govern security of and access to various kinds of student information.

I. Category "A" Information includes official administrative records that constitute the minimum personal data necessary for operation of the educational system.

   A. Types of "A" information

      1 Name, address, telephone number of student

      2 Name, address, telephone number of parent(s) or guardian(s), or surrogate(s) and their residence or work

      3 Birth date

      4 Academic work completed

      5 Level of achievement

         a) grades

         b) standardized achievement test scores

      6 Attendance data

   B. Period of maintenance of "A" data is 100 years

   C. As specified under the Administration of Security Section, students who have reached age eighteen or who are less than eighteen years of age and married, or their parent(s) or guardian(s) or surrogate(s) must be afforded the right to challenge the veracity of "A" type information.

11. Category "B" Information includes the verified information of clear importance for providing appropriate instruction and supportive services for the student at a given point in time, but not absolutely necessary to the school over time, in helping the child or in protecting others.

A. Types of "B" Information

1 Scores of standardized intelligence and aptitude tests (group and individually administered)

2 Interest inventory results

3 Vocational assessment

4 Health data

5 Family background information

6 Verified teacher, counselor, or social worker ratings and/or observations

7 Verified reports of serious or recurrent behavior patterns

B. Period of Maintenance of "B" type information

1 "B" type information will be reviewed by the Special Education supervisor and/or psychologist responsible for the program in which the student is enrolled when the student transfers from an elementary school level program to a junior high school level program and from a junior high school level program to a high school level program.

2 In addition to points 2-B-1, "B" type materials will be reviewed by the Special Education Supervisor and certified school psychologist responsible for the child's program and the child's placement prior to each change of educational program placement (e.g. MR class to regular class, PH class to regular class)

3 After each periodic review of "B" type information, information which is no longer relevant may be destroyed

4 After the child leaves the Intermediate Unit's school program, "B" type information may be maintained when:

a) good cause for retention of "B" type information can be demonstrated to the Director of Special Education and the Intermediate Unit Executive Director, and

b) parents are notified of the materials retained, or

c) "B" type information is rendered anonymous and maintained for research purposes

5 Conditions for access to "B" type information are specified under the Dissemination of Information section of this document

III. Category "C" information includes potentially useful information but not verified or clearly needed beyond the immediate present; for example, legal or clinical findings including certain personality test results, and unevaluated reports of teachers, counselors, and others which may be needed in ongoing investigations and disciplinary or counseling actions

A. Such information must be dated and signed by the person recording that information before entry into the student's file. To file such information, teachers, social workers, speech therapists, vocational evaluators, and other non-supervisory personnel must have the written permission of their supervisor or the certified school psychologist responsible for the child before entering such information into the student's file. Permission of the supervisor or certified school psychologist should be indicated by his/her signing this information and dating it.

B. Such information must be:

1 Reviewed at least once each year by the supervisor of Special Education and/or certified school psychologist responsible for the child and the program in which the child is enrolled and destroyed as soon as its usefulness has ended, or

2 Verified and transferred to category "B" status. If reclassified as "B"

a) the child if he has reached age eighteen or is less than eighteen and is married or his parent(s) or guardian(s) or surrogate(s) must be notified and the nature of the information explained

b) the child if he has reached age eighteen or is less than eighteen and married or his parent(s), guardian(s), or surrogate(s) must be afforded the right to review such information and appeal the classification change

C. If "C" type information is, for any reason, maintained for more than one year, the existence of such information must be discussed with the child who has reached age eighteen or is less than eighteen years of age and is married or his/her parent(s), guardian(s) or surrogate(s) and the reason for maintenance must be provided with the right of appeal afforded.

IV. Pertaining to confidential, personal files of school psychologists, social workers, counselors, and psychiatric consultants, the Intermediate Unit recognizes that, in some instances, professionals working in the school may maintain personal and confidential files containing notes, transcripts of interviews, clinical diagnoses, and other memory aids for their own use in counseling pupils. Any and all data that are considered to be the personal property of the professional should be guarded by the rules given above in addition to those dictated by professional ethics, subject to the terms of the employment contract between the school and the professional and any special agreements made between the professional and the individual student, parent(s), guardian(s), or surrogate(s).

ADMINISTRATION OF SECURITY

I. The Intermediate Unit will designate a Director of Pupil Records who is responsible for record maintenance and access, and for education of the staff concerning maintenance and access policies. All Intermediate Unit personnel having access to records will receive periodic training in security with emphasis upon privacy rights of students and parents.

II. Records should be kept under lock and key at all times under the supervision of the professional designated in I.

III. Access to computerized or microfiche files can be granted only by the director of pupil records. Such files will be reclassified by "A", "B", and "C" categories and maintained under the conditions set forth in Classification and Maintenance of Records.

IV. The Intermediate Unit will establish a quasi-judicial review panel composed of the Intermediate Unit Executive Director, the Director of Special Education, the Director of Pupil Records, and one non-school employee to be appointed by the Montgomery County Intermediate Unit Board of School Directors to determine the validity of category "C" information and to provide for parental challenges of such information on occasions where their transfer to category "B" is held to be desirable.

V. In challenging change of category or veracity of information, students who have reached age eighteen or who are less than eighteen years of age and married or their parent(s), guardian(s), or surrogate(s) should be informed of their right to counsel, their right to present evidence, and their right to cross examine witnesses. Parents should receive reasonable time (30 days) to prepare for such a proceeding.

V. Students who have reached age eighteen or who are less than eighteen years of age and married or their parent(s), guardian(s), or surrogate(s) should be informed of their right to challenge the decision of the quasi-judicial review panel as specified in IV by presenting their challenge to the Montgomery County Intermediate Unit Board of School Directors. Students who have reached age eighteen or who are less than eighteen years of age and married or their parent(s), guardian(s), or surrogate(s) should receive reasonable time (thirty days) to prepare for this appeal proceeding.

DISSEMINATION OF INFORMATION REGARDING PUPILS

As indicated in previous sections, all information regarding students and their families should be collected and maintained under such safeguards of privacy as may be obtained through informed consent, verification of accuracy, limited access, selective discard, and appropriate use. As long as the data are retained within the Intermediate Unit, it can implement these principles with some flexibility of procedures. The Intermediate Unit, however, is often asked to transmit student information to other agencies, institutions, and even individuals. Such requests may come from schools, colleges, employers, courts, police, social agencies, and others. Since conveyance of records removes the data from control of the Intermediate Unit, much more stringent precautions are required to protect the rights of the students against infringement of privacy, misinterpretation of data, and inappropriate use.

I. The Intermediate Unit may, without consent of parents or students, release a student's permanent record file, including categories "A" and "B" type information as defined above, to:

   A. Other Intermediate Unit personnel, including psychiatrists, psychologists, social workers, teachers, educational supervisors, within the Intermediate Unit who have a legitimate educational interest. All personnel desiring access to pupil records, however, should be required to sign a written form which would be kept permanently on file, indicating specifically the "legitimate educational interest" that they may have in seeking this information. Such a file should be available to students who have reached eighteen or who are less than eighteen years of age and are married and to their parent(s), guardian(s) or surrogate(s) and to the official responsible for record maintenance as a means of auditing the operation of the system.

   B. Personnel of the constituent districts of the Montgomery County Intermediate Unit, including teachers, who also have a legitimate

educational interest. Procedure for access should follow the procedure described above in 1, Section A.

C. The Pennsylvania state Secretary of Education and his officers, subordinates or designees, so long as the intended use of the data is consistent with the statutory powers and responsibilities of the Secretary of Education. The statutory powers and responsibilities of the Secretary of Education are defined in Basic Regulations for Education.

D. Officials of other primary or secondary school systems in which the student intends to enroll, under the condition that the student who has reached age eighteen or the student who is less than eighteen years of age and who is married or his parent(s), guardian(s) or surrogate(s) be notified of the transfer, receive a copy of the record if desired, and have an opportunity to challenge the records' content using the specified judicial-like procedure as defined in the Administration of Security section of this document.

11. The Intermediate Unit or any Intermediate Unit personnel may not divulge, in any form, to any persons other than those listed in A, B, C, D above, any information contained in the records except:

A. With written consent from the student who has reached age eighteen or who is less than eighteen years of age and is married, or his/her parent(s) or guardian(s) or surrogate(s) specifying records to be released, and to whom, and with a copy of the records to be released to the student who has reached age eighteen or who is less than eighteen years of age and married, or his/her parent(s) or guardian(s) or surrogate(s) if desired, or

B. In compliance with judicial order, or orders of administrative agencies where those agencies have the power of subpoena. In such cases, the student who has reached age eighteen or is less than eighteen years of age and married, or his/her parent(s) or guardian(s) or surrogate(s) must be notified of all such orders and the school's compliance.

III. Where the permission of the student who has reached age eighteen or who is less than eighteen years of age and is married or his/her parent(s) or guardian(s) or surrogate(s) is required for the release of records, procedures for obtaining this permission should take into account the distinctions made under classification of data regarding differences in the kind of data contained in the student's record file, as follows:

A. Routine, non-specific (with respect to information to be released) consent applies only to category "A": type data.

B. Additional, separate, and specific (with respect to information to be released) permission should be required for the release of any data in category "B".

C. Under no conditions, except as specified in II, Section B, should the Intermediate Unit release information gathered by any non Intermediate Unit professional personnel, but included in the Intermediate Unit record with the exception of date of birth. This would include for example, the report of a social worker concerning conditions in the pupil's home, etc.

IV. Each matter of consent for release of information must be handled separately: for example, blanket permissions for release of information within an extended period of time may not be solicited since they, by definition, do not provide an opportunity for informed consent.

V. The Intermediate Unit may comply with parental request for the release of information to other persons or agencies, subject to the qualifications set forth in Section VI below regarding safeguards of the student's rights when he reaches legal age.

VI. With respect to the problem of a student's age and his legal rights, the following exceptions should be made to the principal of parental consent:

A. When a student reaches the age of eighteen or is less than eighteen years of age and is married, his/her consent alone must be obtained.

B. This includes the right to deny parental access to his/her records.

VII. Either a student, or his parent(s) or guardian(s) or surrogate(s), or

their legal representatives, may have access to the official administrative record (category "A" type information). Students who have reached eighteen years of age or students who are less than eighteen years of age and married or their parent(s) or guardian(s) or surrogate(s) may have access to category "B" type data. Students who are less than eighteen years of age and who are not married may have access to category "B" type information with the permission of their parent(s) or guardian(s) or surrogate(s).

A. This rule is subject to the qualifications regarding age and consent specified in VI above.

B. This right of access includes the right to challenge the validity of information contained in the record through the procedures specified in the Administration of Security section of this document involving a formal review process incorporating due process principles.

VIII. The Intermediate Unit may provide anonymous data from its records for research purposes without consent under conditions where the Executive Director has determined that the likelihood of identifying any individual because of his unique characteristics is negligible. A file may be rendered anonymous by removing the student's name, address, name of parent or guardian or surrogate, name of present teacher.

IX. The Intermediate Unit may face instances in which governmental agencies, local, state, and federal, mandate the release of information on individuals. The principle of informed consent should apply in all cases except:

A. Those cases involving Intermediate Unit responsibilities under existing child abuse or neglect statutues.

B. Governmental agencies, in mandating the provision of information should abide by the recommendations herein contained to assure the rights of privacy. Where identification of the individual is nevertheless legally required, with or without consent:

1) Students who have reached age eighteen or students who are less than eighteen years of age and married or their parent(s) or guardian(s) or surrogate(s) will be informed of the specific information which has been provided.

2) For category "C" type information the principles enumerated in II-B and III-C in this section shall apply

NOTIFICATION OF ROUTINE INFORMATION COLLECTION - REPRESENTATIONAL CONSENT FORMS:

1. Multiply Handicapped Program
2. Trainable Mentally Retarded Program
3. Learning Disabilities Program
4. Program for Visually Impaired Children
5. Educable Mentally Retarded Program
6. Speech Program
7. School for Children with Impaired Hearing
8. Itinerant Hearing Program
9. Montgomery County School for Physically Handicapped Children
10. Learning and Adjustment Program

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Mr. Jerome Potter, Supervisor of the Multiply Handicapped Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Pupil Accident Emergency Information Record	Emergency parent location information in case of accident of illness
Pupil Permanent Record - Special Class Placement	Cumulative files of academic progress
Private Physician's Report - Physical Examination	Required for admission to school

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Mr. William Towne, Supervisor of Trainable Mentally Retarded Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Pupil Accident Emergency Information Form	Emergency parent location information in case of accident or illness
Pupil Permanent Record - Special Class Placement	Cumulative academic record
Private Physician's Report - Physical Examination of Pupil	Required for school admission
Profile of Trainable Mentally Retarded Students	Diagnostic Educational Needs Assessment
Program Report Cards for Trainable Mentally Retarded Students	Reports of academic progress

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

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1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Dr. Libby Goodman, Supervisor of the Learning Disabilities Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Informal Reading Inventory	Reading skills assessment
Standard Reading Inventory	Reading skills assessment
Key Meth Diagnostic Tests of Arithmetic	Arithmetic skills assessment
Stanford Achievement Test	Group achievement Test
Gates-McKillop Reading Test	Reading skills assessment
Durrell Reading Test	Reading skills assessment
Boehm Test of Basic Concepts (Primary Students Only)	Assessment of positional and numerical time concepts
Goodman-Hammill Basic Skills Inventory	To assess basic pre-school skills
Emergency Information Form	Emergency parent location information in case of accident or illness

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

24 Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Mr. Michael Reilly and Mr. Spencer Davis, Supervisors of the Educable Mentally Retarded Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Stanford Achievement Test	To assess academic progress
Pupil Accident Emergency Information Record	Emergency information in case of accident or illness
Pupil Permanent Record - Special Class Placement	Cumulative records of achievement
Private Physician's Report - Physical Examination of Pupil	Required for School placement
Durrell Reading Analysis Test	To assess reading progress
Gates-McKillop Reading Test	To assess reading progress
Key Math Diagnostic Arithmetic Test	To assess arithmetic progress
Woodcock Tests of Reading Mastery	To assess reading progress

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

PECIAL EDUCATION-BLUE LINE COMMUNICATION

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendation of Mr. Ben Williams, Supervisor of the Program for Visually Impaired Children of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Peabody Individual Achievement Test	To assess academic progress
Pupil Accident Emergency Information Record	Emergency parent location information in case of accident or illness
Program Progress Report	To assess gains as a result of Program

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

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PECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Dr. Robert Leiss, Assistant Director of Special Education and Supervisor of the Speech Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
ACLC Assessment of Children's Language Comprehension	Measures understanding of language
Screening and Diagnostic Tests of Articulation	Identifies children with articulation problems
Boehm Test of Basic Concepts	Measures positional and numerical conceps
Boston University Speech Sound Discrimination Picture Test	Measures ability to hear small differences of speech sounds
Carrow Elicited Language Inventory	Measures adequacy in utilizing expressive-receptive language
Denver Developmental Screening Test	Measures developmental milestones
Fisher-Logemann Test of Articulation Competence	Measure of speech-articulation
Goldman-Fristoe Test of Articulation	Measure of speech-articulation
Goldman-Fristoe-Woodcock Test of Auditory Discrimination	Measures hearing differences between speech sounds
McDonald Deep Test of Articulation: Picture Form	Measure of speech-articulation
McDonald Deep Test of Articulation: Sentence Form	Measure of speech-articulation
Northwestern Syntax Screening Test	Measures language adequacy
Oral Language Screening Test-Stephens	Measure of expressive language skills
Peabody Picture Vocabulary Test	Measures understanding of language vocabulary
REEL-Receptive-Expressive Emergent Language Scale	Measure of language adequacy
Spencer-McGrady Sentence Repetition	Measure of adequacy of expressive language skills
Templin-Darley Tests of Articulation	Measure of speech-articulation
Utah Test of Language Development	Measures expressive-receptive language adequacy
Verbal Language Development Scale	Measures expressive-language adequacy

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Dr. Robert Leiss, Assistant Director of Special Education and Supervisor of the School for Children with Impaired Hearing of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Boehm Test of Basic Concepts	Measures understanding of position and numerical concepts
Peabody Picture Vocabulary Test	Measures understanding of language vocabulary
Peabody Individual Achievement Test	Measures general educational achievement skills
Stanford Achievement Test	Measures general educational achievement skills
Carrow Elicited Language Inventory	Measures adequacy of expressive-receptive language
Word Intelligibility by Picture Identification	Measures sound discrimination skills
Key Math Diagnostic Arithmetic Test	Measures numerical skills
Mastery Level Tests for Ginn 360 Series; Houghton-Mifflin Math Series; Scott-Foresman Math Series	Measures numerical concepts
Fisher Logemann Articulation Test	Measures articulation adequacy
Daniel Ling Phonetic and Phonological Analysis	Measures articulation skills
Carter Buck Articulation Test	Measures speech-articulation skills
Informal Language Sample	Identifies language problems

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be chekced carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Dr. Robert Leiss, Assistant Director of Special Education and Supervisor of the Itinerant Hearing Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Costello Speech Reading Inventory	Measures speech reading skills
Ultey Speech Reading Inventory	Measures speech reading skills
Word Intelligibility by Picture Identification	Measures sound discrimination
Larson's Auditory Discrimination Test	Measures ability to discriminate between speech sounds
Wepman Auditory Discrimination Test	Measures ability to discriminate between speech sounds
Goldman-Fristoe Auditory Discrimination Test	Measures ability to discriminate between speech sounds
McGrady Memory for Sentences	Measures understanding language by length of stimulus
Carrow Elicited Language Inventory	Measures adequacy in utilizing receptive-expressive language
Peabody Picture Vocabulary Test	Measures understanding of language vocabulary
North Western Syntax Screening Test	Assessment of language adequacy
Developmental Sentence Scoring	Assessment of language adequacy
Myklebust Written Language Test	Measures adequacy of written language ability
Informal Language Sample	Identifies language problems
Peabody Individual Achievement Test	Measures general educational achievement skills
Woodcock Reading Mastery Tests	Measurement of reading achievement level
Key Math Diagnostic Arithmetic Tests	Measurement of numerical skills
Illinois Test of Psycholinguistic Ability	Measures basic language adequacy skills
Detroit Test of Oral Commissions	Measurement of receptive language
Knox Cube Test	Measurement of abstract spatial relationships
Digit Span Test	Measures adequacy of auditory memory span

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Mr. Peter Boardman, Assistant Director of Special Education and Supervisor of the Montgomery County School for Physically Handicapped Children, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Pupil Permanent Record Card	Previous academic performance and attendance
General Academic Progress Report	Required educational and therapeutic yearly progress report
Annual Therapy Report	Required educational and therapeutic yearly progress report
Stanford Achievement Test	Grop Test to assess educational progress
Palo Alto Reading	To assess reading progress
Heath Math	To assess arithmetic progress
Indivdual Monitoring System (Palo Alto)	To assess educational mastery of reading skills
Informal Reading Inventory	To assess reading progress
Peabody Individual Achievement Test	To assess educational progress
Woodcock Reading Mastery Tests	To assess reading progress
Keymath Diagnostic Arithmetic Tests	To assess math progress
Therapies - Motor Performance Test; Test of Fine Motor Coordination (as Ayres); Observational Test of Gross Motor Function	To assess current psychomotor skills

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

NOTIFICATION OF ROUTINE INFORMATION COLLECTION

Date:

Dear Parent:

In accordance with the recommendations of Mrs. Nancy Anderson, Assistant Director of Special Education and Supervisor of the Learning and Adjustment Program of the Montgomery County Intermediate Unit, the following types of information will be gathered during the coming school year:

Type of Information:	Purpose:
Key Math Diagnostic Arithmetic Test	To assess arithmetic skills and progress
Woodcock Reading Mastery Tests	To assess reading skills and progress
Individual Reading Inventory	To assess reading skills and progress
Durrell Reading Diagnostic Test	To assess reading skills and progress
Gates-McKillop Reading Diagnostic Test	To assess reading skills and progress
Stanford Achievement Test	Group test to assess academic progress
Achievement Expectance Sheet	To assess potential academic achievement
Emergency Information Form	Emergency parent information in case of accident or illness

This information is necessary to help the teacher assess your child's academic progress in order to provide an appropriate educational program for your child.

Your child's scores on these tests will be checked carefully and maintained in the school record as long as your child attends school in this system. Should your child transfer to another school system, you will be notified of the transfer of his or her permanent record to the new school system.

Should you wish to examine your child's record file at any time you may arrange to do so by making an appointment with the supervisor's office.

Sincerely,

Dennis Harken, Executive Director
Montgomery County Intermediate Unit

cc: Custodian of Records
Montgomery County Intermediate Unit

ECIAL EDUCATION-BLUE LINE COMMUNICATION

INDIVIDUAL CONSENT FORMS:

1. Request for Permission to Collect Personal Data - Psychological Evaluation
2. Request for Permission to Collect Personal Data - Educational Evaluation
3. Request for Obtaining Ancillary Evaluations
4. Request of Information
5. Release of information
6. Record of Inspection of Pupil Records
7. Notification of Transfer of Permanent Pupil Record to Another School System

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

REQUEST FOR PERMISSION TO COLLECT PERSONAL DATA - PSYCHOLOGICAL EVALUATION

Date:

Dear

Your child, _____ has been referred for a psychological evaluation by _____.

The reason for this referral is: _____

_____.

This evaluation will be provided by _____, a Certified School Psychologist of the Montgomery County Intermediate Unit, and the results of this evaluation will be discussed with you upon completion of the evaluation. This evaluation will be performed at your child's school during school hours and the results of this evaluation will be maintained in confidence and shared only with appropriate, authorized school personnel.

To accomplish this evaluation, one or more of the following techniques will be used: _____

_____

_____

On the form below, please check the appropriate line indicating your approval or disapproval of this evaluation and return this form in the enclosed envelope. Should you have any questions or comments, please feel free to contact me at 539-8550.

Sincerely yours,

(Signature) _____

(Title) _____

.....

Dear

_____ I hereby grant permission for the psychological evaluation as indicated above.

_____ I hereby deny permission for the psychological evaluation as indicated above.

_____
Signature of Parent(s) or Guardian(s)

_____
(Date)

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

REQUEST FOR PERMISSION TO COLLECT PERSONAL DATA - EDUCATIONAL EVALUATION

Date:

Dear

Your child, _____ **has been**

referred for an educational evaluation by _____.
The reason for this referral is to determine the child's academic functioning to help develop an appropriate program for him or her.

This evaluation will be provided by _____
of the Montgomery County Intermediate Unit staff and the results of this evaluation will be discussed with you upon completion of this evaluation. These results will be maintained in confidence and shared only with appropriate, authorized school personnel.

To accomplish this evaluation, one or more of the following techniques will be used: _____

_____

_____

In order to gather this information, your written permission is required. Please check the appropriate line on the form provided below. Should you have any questions or comments, please feel free to contact me at 539-8550.

Sincerely yours,

(Signature) _____

(Title) _____

.....

Dear

_____ **I hereby grant my permission for the educational evaluation as indicated above.**

_____ **I hereby deny my permission for the educational evaluation as indicated above.**

_____
(Signature of Parent(s) or Guardian(s)

_____
(Date)

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REQUEST FOR OBTAINING ANCILLARY EVALUATIONS

Date:

Dear

Your child has been referred for the following type(s) of evaluation:

_____ Social Work Evaluation
_____ Neurological Evaluation
_____ Psychiatric Evaluation
_____ Audiological Evaluation

The results of this evaluation will be shared with you upon completion of the evaluation. These results will be maintained in confidence and shared only with appropriate, authorized school personnel. Should you have any questions about this evaluation, please contact me at 539-8550. In order to provide this evaluation, your written permission is required. Please complete the form below and return this letter to me as soon as possible.

Sincerely yours,

(Signature) _____

(Title) _____

.....

Dear

_____ I hereby grant permission for the evaluation as indicated above.

_____ I hereby deny permission for the evaluation as indicated above.

_____
Signature of Parent(s) or Guardian(s)

_____
(Date)

ECIAL EDUCATION-BLUE LINE COMMUNICATION

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

REQUEST OF INFORMATION

Date:

To: _____

_____

_____

Dear_____:

Please release the following information: _____

_____

_____

_____

to_____, (Title)_____ of

The Montgomery County Intermediate Unit for my child_____.

Thank you,

_____

(Signature)

_____

(Relationship)

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-53

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

RELEASE OF INFORMATION

Date:

_____

Montgomery County Intermediate Unit
Special Education Center
1605-B West Main St.
Norristown, Pa. 19401

Dear_____:

I hereby grant to you permission to release the following information:

_____

_____

to: _____ concerning my

child _____.

Thank you,

_____
(Signature)

_____
(Relationship)

cc: Custodian of Records
Montgomery County Intermediate Unit

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

RECORD OF INSPECTION OF PUPIL RECORDS

Date:

Records Examined: _____
(Name of pupil or pupils)

Records Examined By: _____

Purpose: _____

_____

_____

_____

_____

_____

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

NOTIFICATION OF TRANSFER OF PERMANENT PUPIL RECORD TO ANOTHER SCHOOL SYSTEM

Date:

Dear Parent:

You are hereby notified of the pending transfer of _____'s permanent school record to _____ in _____.

Should you wish to receive a copy of the record to be transferred, please return the bottom portion of this form with your signature by _____.
(Date)

Sincerely,

_____
Barton P. Proger, Ed.D
Custodian of Records
Montgomery County Intermediate Unit

.....

Barton P. Proger, Ed.D, Custodian of Records
Montgomery County Intermediate Unit
Special Education Center
1605-B West Main St.
Norristown, Pa. 19401

Dear Dr. Proger:

I wish to receive a copy of the school record of _____
(Please print name of pupil)

who is my (son) (daughter) (legal ward).

_____
Signature of Parent(s) or Guardian(s)

_____
(Date)

Address to which transcript should be sent:

_____

_____

_____

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

Thank you for filing all information necessary for referring

_____ to the _____

Program of the Montgomery County Intermediate Unit. I reviewed this file on _____ and forwarded the file to _____, Supervisor of the Program requested.

Sincerely yours,

Coordinator of Psychological Services
Montgomery County Intermediate Unit

mec

cc:

OPERATIONAL GUIDELINES:
DEPARTMENT OF PUPIL RECORDS

MONTGOMERY COUNTY INTERMEDIATE UNIT 23
DENNIS U. HARKEN, PH.D., EXECUTIVE DIRECTOR
LESTER MANN, PH.D., DIRECTOR OF SPECIAL EDUCATION
BARTON B. PROGER, ED.D., DIRECTOR OF PUPIL RECORDS

OPERATIONAL GUIDELINES:
DEPARTMENT OF PUPIL RECORDS

by

Barton B. Proger

Montgomery County Intermediate Unit No. 23
1605-B West Main Street
Norristown, PA 19401

September, 1975

Version of November 7, 1975

PREFACE

This booklet is meant to serve as a set of operational guidelines that the Department of Pupil Records and all other staff members of the Division of Special Education can use in their attempts to implement the local polica on confidentiality. In particular, this document serves as a clarification of a previous document entitled, Principles of Collection, Maintenance, and Dissemination of Pupil Records, prepared by Dr. Ronald Fischman and Mrs. Shirley Bilker and other members of the Psychological Services Department. The Principles were given interim approval by the Montgomery County Intermediate Unit Board of School Directors at its monthly meeting of August 27, 1975. The assistance of the latter two people in preparing the present document (Operational Guidelines) is greatly appreciated.

GENERAL PROCEDURES
FOR OPERATION OF
EVERY I.U. STUDENT
RECORD COLLECTION

(1) All student record collections maintained by Intermediate Unit facilities throughout the County are to operate in accord with the "Principles of Collection, Maintenance, and Dissemination of Pupil Records" given interim approval by the Intermediate Unit Board on August 27, 1975. All student record collections are also to be covered by the procedures contained in this document unless noted otherwise. The record collections that are covered by these two documents include (but are not limited to) the Central Student Record Collection, Learning and Adjustment Active Student Record Collection, Learning Disabilities Active Student Record Collection, Lansdale Speech and Hearing School Record Collection, PH School Record Collection, MH School Record Collection, and WMSEC Record Collection, Itinerant Speech and Hearing Active Record Collection, and Itinerant Vision Services Active Record Collection.

(2) Each student record collection operated by the Montgomery County Intermediate Unit is to assign one person (usually a secretary) to watch over the access to the collection. This assignment is the duty of the program-area administrator who has ultimate responsibility for that collection of student records. Only such a designated person (or persons) is to have direct access to the cabinet (s) containing the records. This means that henceforth there will not be allowed any unlocked student record file cabinets in any part of the Intermediate Unit for any extended period of time. The person so designated to watch over each separate student record collection will be the only one to retrieve records from

the cabinets; henceforth no other staff members will be allowed freedom of access to these many separate student record collections. This means that in the future all psychologists, etc., are to telephone their requests to the person assigned operational responsibility for the student record collection, and only that person will retrieve the record (the exact steps are outlined below). The single exception to this procedure will be in the case of the Learning and Adjustment Active Files. Here, because of the large volume of requestor traffic, the secretary assigned to watch over the records will keep cabinets locked but will allow qualified staff members to have the keys upon request so that the staff members themselves may look up the records.

(3) Only those people listed on the eligibility list and any of its later updates (see Appendix A) are allowed to ask for student records; no other staff members or outsiders are allowed access to these records (as discussed later in this document, Dr. Proger--as Director of Pupil Records -- will handle all future requests for release of records by "outside" sources such as district people, private schools, out-of-state sources, and so on).

(4) A standardized log-book for sign-out purposes will be kept separately by each person responsible for watching over each Intermediate Unit record collection (see Appendix B for format which is to be followed as of September 2, 1975, onward by all collections). Every single hands-on usage of any student record will be documented in this log book <u>except</u> routine additions of new paperwork to a file (i.e., simple filing). Every time a file moves out of the cabinet an entry will be made by the person who watches over that collection. No exceptions are to be made for anyone, regardless of position.

(5) Any potential user of student records is to be bound henceforth by the procedures outlined in Figure 1 and/or Figure 2 (if the master collection is also to be consulted). The single exception is the active Learning and Adjustment files, which have already been discussed above in (2), . Basically, regardless of which particular collection is being consulted, the requestor is to phone in his request to the person charged with watching over that collection. At that time the following information is to be given:

(a) requestor's name
(b) reason for request
(c) name of child
(d) current program of child or other status
(e) school district or other location
(f) last time evaluated (if known)

From that point onward, the person watching over the collection is responsible for carrying out the steps listed in Figure 1 and/or Figure 2. The requestor is to wait until the person watching over the collection phones back to apprise him of the status of the request. If the record is found, it is the responsibility of the requestor to go to the person watching over the collection and to sign out the documents. The person watching over the collection should not be expected to bring the record to the requestor, and in no case will student records ever be left in mail boxes or in unguarded, open places.

(6) At the point of sign-out of the records by the requestor in person, the records can be borrowed for a period of two days. At no time are the records so borrowed to leave the building in which they are normally housed (whether it be the Special Education Center, WMSEC, Lansdale Speech and Hearing School, etc.)

(7) The person watching over the collection will continuously monitor her log book each day and when a two-day borrowing period is exceeded for any requestor, the person watching over the collection will call him to ask for return of the documents in person. If the

FIGURE 1

REQUEST FOR RECORD
TO ANY ACTIVE COLLECTION

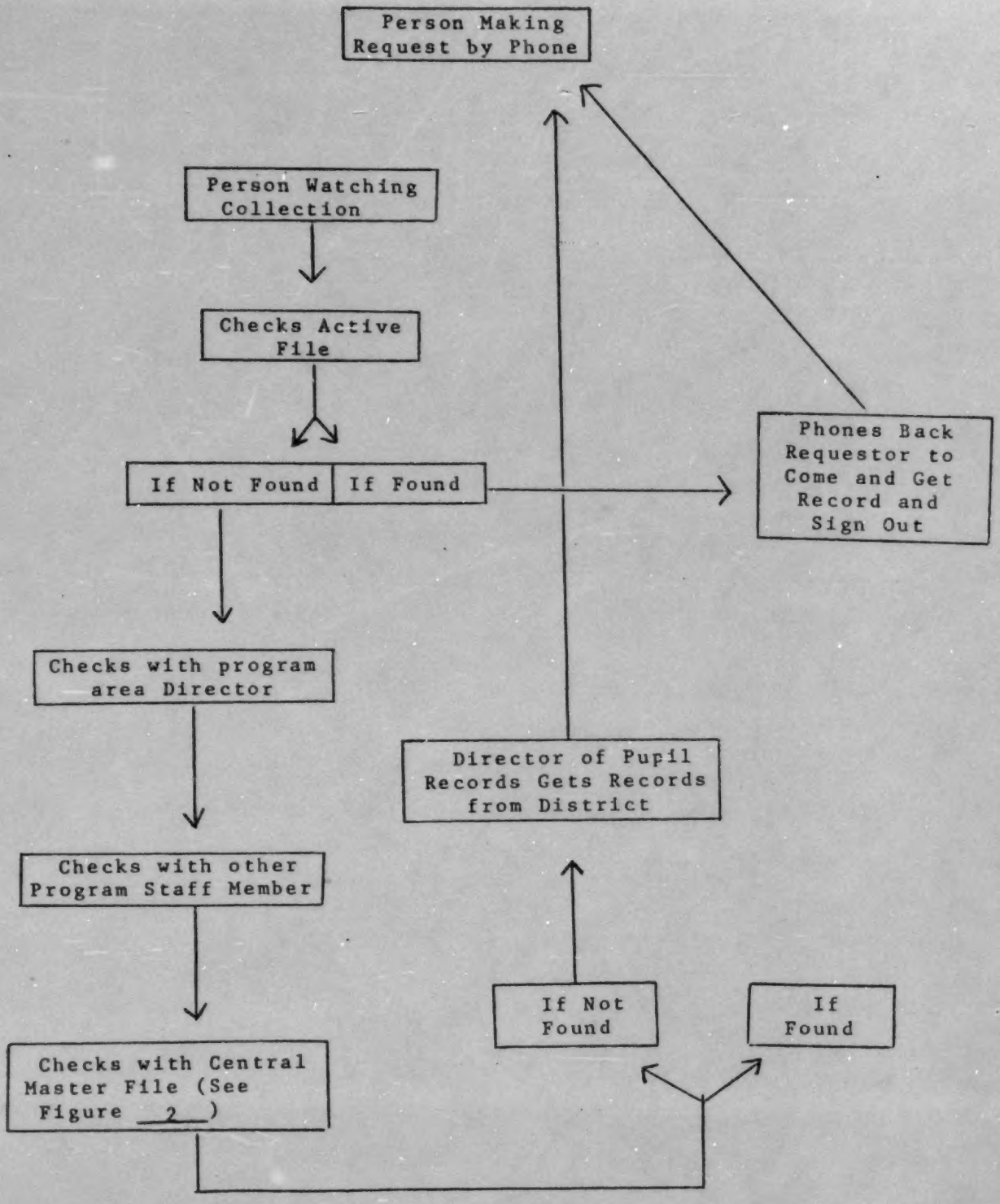
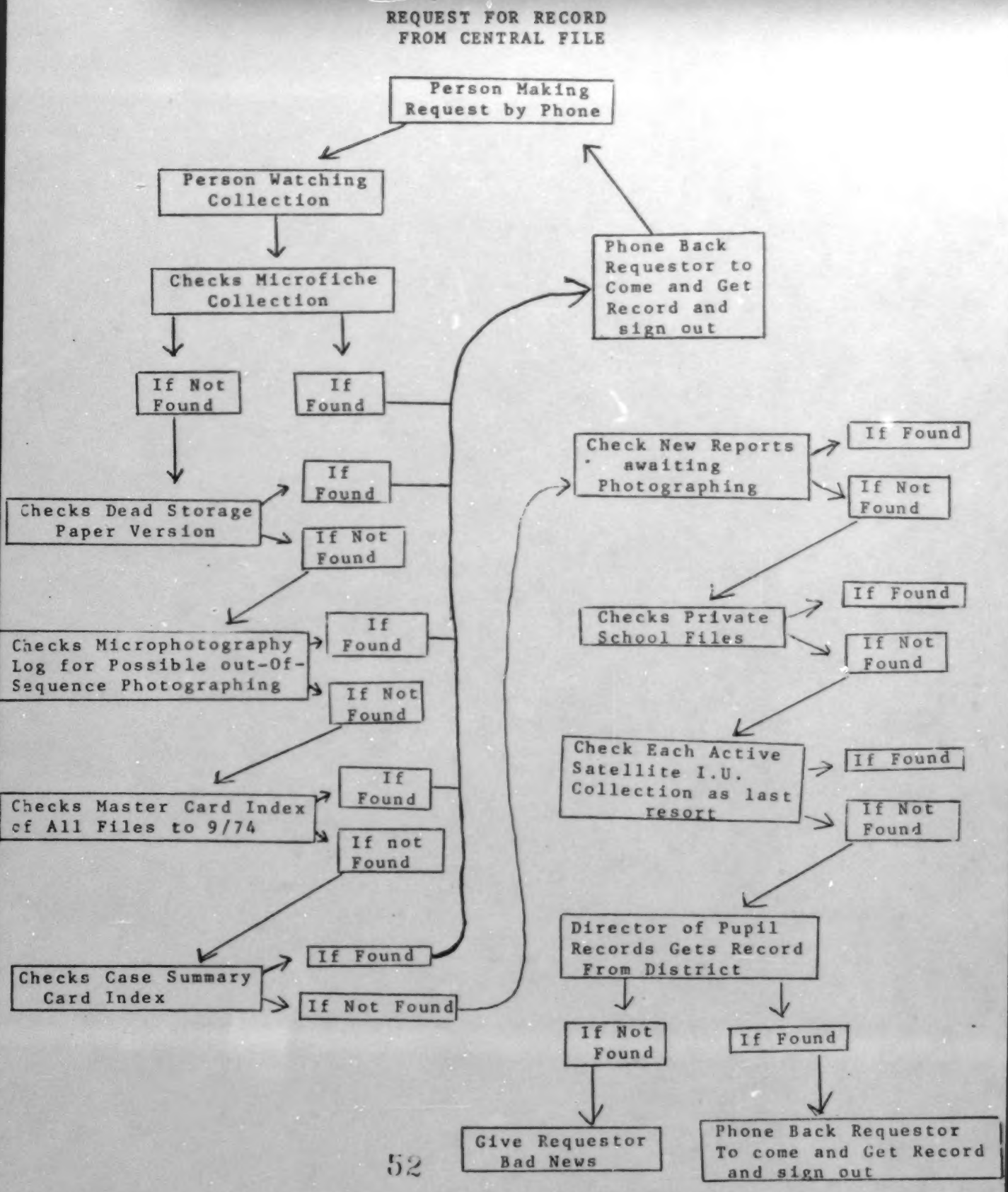

Person Making Request by Phone
Person Watching Collection
Checks Active File
If Not Found
If Found
Phones Back Requestor to Come and Get Record and Sign Out
Checks with program area Director
Director of Pupil Records Gets Records from District
Checks with other Program Staff Member
If Not Found
If Found
Checks with Central Master File (See Figure 2)

FIGURE 2


REQUEST FOR RECORD FROM CENTRAL FILE
Person Making Request by Phone
Person Watching Collection
Checks Microfiche Collection
If Not Found
If Found
Phone Back Requestor to Come and Get Record and sign out
Checks Dead Storage Paper Version
If Found
If Not Found
Checks Microphotography Log for Possible out-Of-Sequence Photographing
If Found
If Not Found
Checks Master Card Index of All Files to 9/74
If Found
If not Found
Checks Case Summary Card Index
If Found
If Not Found
Check New Reports awaiting Photographing
If Found
If Not Found
Checks Private School Files
If Found
If Not Found
Check Each Active Satellite I.U. Collection as last resort
If Found
If Not Found
Director of Pupil Records Gets Record From District
If Not Found
If Found
Give Requestor Bad News
Phone Back Requestor To come and Get Record and sign out

documents are needed for more than two days, the requestor is to go to the person watching over the records and to sign out for another two-day period.

(8) Periodically, the person watching over the record collection and the logbook will have the logbook pages duplicated, cut apart, and inserted into the appropriate student files so as to show usage of records within a child's file, as well as cummulatively in the logbook. A notation should be made on each original logbook page as to when this duplication of pages occurred so as to avoid redundancy of effort.

(9) Any complaints or comments on the operational procedures of all Intermediate Unit student record collections, or on the personnel assigned to watch over the collections, are to directed to the Director of Pupil Records, Dr. Proger. If no satisfaction is obtained, such complaints or comments are to directed to Dr. Mann.

OPERATIONAL PROCEDURES
FOR MAINTENANCE OF
INFORMATION IN STUDENT
RECORD COLLECTION

(1) In the "Principles of Collection, Maintenance, and Dissemination of Pupil Records" (adopted August 27, 1975 by the Montgomery County Intermediate Unit School Board), under "Classification and Maintenance of Data", three categories of information (A, B, and C) are described. Of particular note to all staff members eligible to have access to the records are the facts that Category B data must be reviewed at major milestones in the student's career (transfer from elementary school to junior high school and from junior high school to senior high school and at termination of Intermediate Unit contact) and that Category C data must be reviewed annually.

(2) The review of Category B and Category C information will be carried out by those who know the child best at the administrative levels, namely, the supervisors assigned to the children's teachers.

(3) In effect, the review of Category B Information (whenever that type of data falls due for review as specified in Part 1 of this Section) is best done at the same time as the annual Category C review.

(4) For Category B information, a special set of procedures has been devised. Appendix C contains a form entitled, "Review of Category B Information." The supervisor is to use this form in connection with a given child's folder. The form serves the dual purposes of internal recordkeeping on what has occurred during the review process and of notifying the parent on what is happening. It is the supervisor's responsibility to schedule these reviews for all students under his jurisdiction. The supervisor is responsible for completing the Category B form in Appendix C, for having it duplicated, for sending the original to the parent, and for insert-

ing the duplicate into the child's file.

(5) As the time of Category B review, the supervisor will stamp every document that he has listed on the Category B form with the stamp tentatively given in Appendix D and will fill in the blanks appropriately. The stamp will avoid redundancy of efforts in future reviews.

(6) It will frequently be the case that a document has all three categories of information in it (A,B, and C). In this case, the entire document should be considered of C type, and the entire document will be listed on the C form (described later in this section). Examples of "pure" documents that would fall into Category B would be an intelligence test protocol sheet and a health data form with no confidential social history aspects on it. The basic principle is that a document will not be "cut up" into A,B, and C parts. In effect, both the Category B form of Appendix C and the Category C form of Appendix E are for the purpose of moving as much information as possible into Category A, and whenever any document is in question, the most stringent level of information contained in it should be the determining factor. For Category C information, a similar but separate set of procedures has been devised (see Appendix E). It is the responsibility of each supervisor to schedule an annual review of Category C information for child under his jurisdiction. Appendix F contains the Category C stamp that has been devised for the purpose of avoiding redundancy of effort by later reviewers.

(7) The B and C Review Forms of Appendices C and E are only for the purposes of placing such information up into "permanent" status (Category A). This procedure is to be followed whenever possible. However, if the program supervisor does not feel that his chances

of getting approval are good for a certain type of document (perhaps a psychiatric report), then he is not only to use the regular B and C Review Forms but is also to use the Modified B and Modified C Review Forms given in Appendices G and H, respectively. The Modified B and Modified C Review Forms transfer such information not up to A status but only up to B status (obviously a less desirable operation because this very same information has to be reviewed again at the usual B milestones mentioned eralier). Whenever a document has been considered to be suitable only to Modified B or Modified C review, then the appropriate stamp given in Appendix D (second stamp on that page) and/or in Appendix F (second stamp on that page) is to be used in those cases to alert future reviewers for avoiding redundancy.

(8) It is the responsibility of the supervisor to keep track of what parents have sent back their signed and completed "B", "C", Modified B, and Modified C review forms (Appendices C, E, G, and H). If a parent has not returned a form within a reasonable amount of time, then the supervisor is to send out a reminder along with a copy of the appropriate review form that was initially filled in by the supervisor. To maintain such a tracking system, it would seem most efficient for each supervisor to keep separate folders in his personal files for "B" and "C" review purposes with a list of <u>all</u> children under his jurisdiction in <u>both</u> folders. Then, as reviews are completed the supervisor can indicate thusly in his working folder as to when the particular review form was sent to the parent. Each time a parent send back a completed review form, Dr. Proger will notify the appropriate supervisor by means of a form (Appendix I) that the review form has been returned and placed in the child's file. The supervisor should then make an entry in his own log-book-type file of that date of return. Periodically the supervisor should check over his personal "B" and "C" review folders to see what

parents have not returned a review form. If a supervisor is in doubt as to whether or not he has been notified, he should contact Dr. Proger.

SPECIFIC OPERATIONAL
PROCEDURES FOR USING
THE CENTRAL STUDENT
RECORD COLLECTION

(1) The student folders in the central record collection in the Special Education Center have been undergoing microfilming. Apart from the photographing of the document itself onto film, the person assigned to watch over the microfilm room has had to stuff each child's strip of film into a microfiche jacket so that each student will have a physically separate "micro-folder" that can be updated, purged of "B" and "C" data in accord with the "Principles... of Pupil Records", and in general physically moved around for routine usage without impinging on all the other records.

(2) Henceforth, any staff member who needs a record which he believes has been placed in the central collection is to contact that room in the usual manner described for any other collection earlier in this document. However, once that staff member has been notified by the Microfilm Room that the document is available, he is to personally go up to the Microfilm Room and, after signing out in the usual way, is to read the document in microfilm format on one of the reader-printer machines located in the room. In other words, there no longer will be paper versions of student records placed in the central collection available for routine usage as in the active satellite record collections. (In effect, the paper version will still be available until we have double-checked all records to see if all documents have been photographed properly, but these paper records are no longer for routine usage due to space problems).

(3) If an Intermediate Unit staff member who has come to the central collection to use a microfilmed record feels he wants to take back a copy of a portion of the child's record to his desk, the reader-printer machine will be able to make a photographic copy. This copy in turn will be signed out in the usual fashion as a new

document, and the two-day return stipulation applies to this document also.

MISSING FOLDERS

(1) With Intermediate Unit operations of the size currently in effect, it is inevitable that some student records will be lost, misplaced, misfiled, or otherwise go into "missing-in-action" status. This is a fact of life that all Intermediate Unit staff members must contend with.

(2) Missing folders have occurred because of several reasons. First, during the microfilming process of the central collection, recent paperwork on early-alphabet children had to be photographed out of normal alphabetical sequence and this occasionally led to misfiling of the old paper version; until that film portion is finally stuffed into microfiche jackets, it may be difficult to provide the requestor with the original paper version. Second, some of the folders in the original central collection file cabinets did not have any documents in them. Third, some folders have simply been misplaced by virtue of the fact that they have been borrowed freely in the past by various staff members and may have been left in some Intermediate Unit office anywhere in the County. Fourth, some misfiling occasionally occurs over the years where several student records were clipped together and the person filing them did not check to see if there was more than one child in that packet.

(3) In the past attempts to reconstruct missing folders have been made in informal ways. Staff members often had routine periodic contact with Districts, and duplicate records could be gotten through those sources.

(4) In the future, whenever a record cannot be obtained as in Figure 1 and/or Figure 2, Dr. Proger will use the form given in Appendix K to formally contact the appropriate district. No other staff members are to make these contacts. It is the responsibility of the requestor or the person watching over the particular record

collection in question to notify Dr. Proger promptly when a record cannot be found and he in turn will immediately send out the appropriate forms.

(5) Arrangements have been made with each district to make them aware of the necessity for such a procedure of reconstructing missing files as implied in the form of Appendix K.

INACTIVE FOLDERS

(1) It is the responsibility of the program area directors and supervisors to notify the person watching each of the active satellite record collections of any child who is going into inactive status.

(2) It is the responsibility of the person watching over that record collection to in turn forward an inactive folder to the central record collection for photographing.

RELEASE OF STUDENT RECORDS

(1) At the time of initial referral and placement of a child, records will be conveyed between the Intermediate Unit and the enrolling school district, as per Section I, Parts B and D, under "Dissemination of Information Regarding Pupils" contained in the "Principles of Collection, Maintenance, and Dissemination of Pupil Records" which were granted interim approval August 27, 1975, by the Montgomery County Intermediate Unit Board of School Directors. Intermediate Unit psychologists and other staff members will attend to this matter. This phase of record release is probably the least aggravating in terms of the communication that is involved. This type of release is viewed as an absolutely necessary conveyance of records to allow the responsible educational agencies (the district and the Intermediate Unit) to program appropriately for the child. It is hoped that districts will view the missing records form (Appendix K) that the Intermediate Unit will be sending to the districts in this same necessary light. During any such release of records (either initial placement transactions or later missing-record requests from the Intermediate Unit), the parents should always be kept informed of what records have been transmitted, but parental releases for conveyance of the records will not be required except for documents loaded with volatile Category C information. (The initial parental approval for referral of the child to the Intermediate Unit covers the necessary notification appropriately).

(2) Releases of information that occur sometime after the transfer of records involved in initial referral and placement are to be considered transactions that require much more stringent precautions than in (1) above.

(3) For releases as described in (2), the general principles used are:

(a) The guidelines set down in the document "Principles of Collection, Maintenance, and Dissemination of Pupil Records" (granted interim approval by the Montgomery County Intermediate Unit Board of School Directors on August 27, 1975) will be adhered to, especially as contained in the section, "Dissemination of Information Regarding Pupils."

(b) Legitimacy of each request for information will be determined in accord with a parental release and eligibility of requestor's position.

(c) No records will be released for which the Intermediate Unit was not the originating source (i.e., a reply to such a request will simply indicate the existence of records such as a district-generated psychological report or a private school's progress report or a private clinic's medical report; the requestor will be told where he can obtain such reports but will not be given the documents themselves).

(d) As of August 27, 1975, for any releases of information on a child who has been enrolled in one of our classes for some length of time, the Intermediate Unit will require signed parental releases specifying all documents to be released and to whom (i.e., no more blanket releases). The reason for being so stringent in <u>all</u> cases is simply the fact that so many otherwise nonthreatening, routine reports contain at least some instances of Category C information (family situations, personality ovservations, etc.) that one is forced to be extra-careful. The Intermediate Unit hopes that districts and other requesting

agencies understand the position of the Intermediate Unit taking this seemingly overly cautious stance, and will try to comply accordingly. In turn, the Intermediate Unit will try to comply with other agencies' confidentiality policies.

(4) All releases for information are to be processed through the Director of Pupil Records, Dr. Proger. This stipulation is required to ensure internal Intermediate Unit compliance with its own "Principles... of Pupil Records." The only two exceptions to this procedure occur during the initial referral and placement process of a child entering an Intermediate Unit class (where the district personnel are releasing records to us rather than vice versa) and during the return of a child who was in an Intermediate Unit class back to a normal Montgomery County district class (documents consisting mainly of Categories A and B information can be routinely transferred back to the district). However, if a child is to move to a district outside Montgomery County, this stipulation no longer applies and an itemized parental release of all documents must be given to the Intermediate Unit (the latter type requests again must go through Dr. Proger).

(5) The most frequently occurring release situations both internal and external to the Intermediate Unit and the procedures needed to process the releases are as follows:

(a) An eligible Intermediate Unit staff member needs to consult a student's folder for his own routine job-related responsibilities. All that is required is the sign-out procedure described avove.

(b) A student is entering a program directly operated by the Intermediate Unit and a folder already exists. If the Intermediate Unit has accumulated

a file on such a student in the past, then the master file or the appropriate satellite file will be transferred to the appropriate active satellite file for the program in which the child will be enrolled. However, the sign-out procedure is still required.

(c) A Montgomery County district staff member involved in pupil personnel services (Director of Pupil Personnel Services, Psychologists, Supervisors) request information on an Intermediate Unit child who will be returning to either a district-operated normal or special class. This situation is one of the exceptions noted in (4) above whereby Dr. Proger does not have to get directly involved in the release of records. Some examples of this situation would be the routine return of a child currently in an Intermediate Unit operated learning disabilities or learning and adjustment class, back to the normal class setting in a Montgomery County district. It should be noted that this could be either back to the district in which the child was originally enrolled or to a different district but still within Montgomery County. In such cases, program-area staff members are to process whatever transfer of records as long as it involves basically only "A" and "B" information (if the child remains within a public district within Montgomery County); in such a case, we would allow a psychological report to be conveyed to the district but not a family history form, psychiatric report, and other documents that are clearly of "C" type (itemized parental releases

are needed in the latter cases.)

It should be noted that while Dr. Proger does not get involved in such cases of transfer of records within Montgomery County public settings, two of his forms for transfer of records (Appendices L and M) should still be used in all such cases. Further, in such instances Dr. Proger is always to receive a copy of the forms and the Intermediate Unit staff member who has processed such transfers of records is to make sure copies of those two forms are placed in the child's file.

Situation (c) should be carefully compared to situation (e), which requires carefully prepared parental releases for all information and must be processed through Dr. Proger.

(d) An Intermediate Unit staff member has requested a file from either the central master collection or from one of the satellite collections and has been unable to obtain all or part of the required information that should be there. In the past the Intermediate Unit staff member would have called the district that might have a file on such a child. However, because of our concern with centralization and increased confidentiality of our student records, Dr. Proger will henceforth contact the district to obtain the file. He will do so in writing (Appendix K), just as we are requesting districts to contact

us in writing when they need files. No one other than Dr. Proger is to contact any district or non-public agencies for records on children from this point forward.

(e) An Intermediate Unit staff member receives a request for a child's record from any public agencies outside Montgomery County or from any private agencies either in or out of the county. Regardless of who receives such a request, it should be forwarded immediately to Dr. Proger with a note explaining the circumstances surrounding the request. The itemized parental release should be included, if available. Dr. Proger will forward the information directly to the agencies making the request, along with appropriate certification of authenticity.

It should be noted that this situation will most likely occur in connection with routine transfers of children currently in Intermediate Unit-run classes as their parents move outside Montgomery County to either public or private shcool settings. While technically information of "A" and "B" type could be transmitted without parental release, the mere fact that such a receiving school is no longer part of the Montgomery County public education system (the Intermediate Unit and its constituent

districts) forces the Intermediate Unit to be quite cautions in <u>everything</u> it sends out. Therefore, Dr. Proger will ask for itemized parental releases for <u>all</u> items to be conveyed, if such a release has not already been received.

(f) <u>An Intermediate Unit staff member initiates a change of placement from either a district-run program within Montgomery County or an Intermediate Unit Program to a different Intermediate Unit program.</u> Since the child in either case will be going into one of the Intermediate Unit programs, all that is needed is a sign-out procedure on the part of the Intermediate Unit staff member making the request. The original paper file or a paper copy of the microfiched file will be physically transferred from the central master file to the appropriate active satellite file.

(6) Two other miscellaneous forms to be used in a routine way are given in Appendices N and O. Appendix N contains the form used when inadequate permission for release of student records occurrs. Appendix O contains the form used when a requestor has not provided proper release permission for records; this form is enclosed with the form of Appendix N to be used by the requestor in obtaining appropriate permission.

APPENDIX A

CURRENT ELIGIBILITY LIST

FOR BORROWING FILES

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

IU PERSONNEL AUTHORIZED TO REMOVE RECORDS
FROM THE MICROFICHE CENTER

Dr. Lester Mann, Dr. Robert Leiss, Mr. Jerry Potter, Mr. Peter Boardman, Mrs. Nancy Anderson, Dr. Barton Proger, Miss Donna DePietro, Mrs. Judy Rizzo

Special Education Supervisors:

Dr. Goodman	Mrs. Neely
Mr. Reilly	Mr. Davis
Mrs. Price	Mr. Simek
Mr. Towne	Mr. Williams
Mr. Potter	Mr. Ridgway
Mrs. Kerr	Mr. Siegel
Mrs. McBride	Mr. Morley

Psychiatrists:

Dr. Marrone
Dr. Rusk
Dr. McIllhenny
Dr. Marcovici
Dr. Schneider
Dr. Houghton
Dr. Scholever

Psychologists:

Dr. Fischman	Mr. Foley
Dr. Duffey	Dr. Fedner
Mrs. Bilker	Mr. Pickholtz
Miss Geisdorf	Dr. Rolnick
Mrs. Massari	Mrs. Sacks
Mrs. Kauffman	

Social Workers:

Mrs. Schultz	Mrs. Bernstei
Mrs. Schankel	Mrs. Rowland
Mrs. Papp	Mrs. Porter
Mrs. Kolsky	Miss Metz
Mrs. Horn	Mrs. Parks
Miss Knight	Mrs. Hurwitz
Mrs. Hutchings	Mrs. McWharte

APPENDIX B

STANDARD LOG-BOOK FORMAT
TO BE KEPT BY EVERY PERSON
WATCHING OVER STUDENT
RECORD COLLECTIONS

MICROFILM/MICROFICHE

RECORDS MANAGEMENT

SYSTEM: USAGE LOG SHEET

User Name: _____

Position : _____

Purpose: _____

Student Records: _____

Business Records: _____

Date _____ Time Given _____ Time Back _____

Person on Duty _____

MICROFILM/MICROFICHE

RECORDS MANAGEMENT

SYSTEM: USAGE LOG SHEET

User Name: _____

Position : _____

Purpose: _____

Student Records: _____

Business Records: _____

Date _____ Time Given _____ Time Back _____

Person on Duty _____

APPENDIX C

REVIEW OF CATEGORY B INFORMATION --TRANSFER TO "PERMANENT" STATUS (CATEGORY A)

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REVIEW OF "CATEGORY B" INFORMATION

TO:

RE: Updating the Record File of the Child_____

(Category B Review Must Occur When Student Moves from Elementary Program to Junior High School Program and from Junior High School Program to Senior High School Program and/or upon Leaving the Program)

We are required to review periodically the information that is contained in your child's file. The purpose of this review is to remove and destroy any items that are no longer of use to us in providing services to your child and/or that are possibly damaging to you or your child (invasion of privacy). Your child's record folder at the Intermediate Unit is divided into three areas of information: Category A, Category B, and Category C. The purpose of the present letter is to inform you of the results of our most recent review of Category B information and to ask your permission to make certain items a part of your child's permanent record folder (Category A). However, before we get into the results of our review, we want you to understand what types of information are kept in each of the three categories.

Category A contains (1) name, address, and telephone number of student, (2) name, address, and telephone number(s) of parent(s) or guardian(s) or surrogate(s), (3) birth date, (4) academic work completed, (5) academic grades, (6) standardized achievement test scores, and (7) attendance data.

Category B contains (1) scores of standardized intelligence and aptitude tests (group and individually administered), (2) interest inventory results, (3) vocational assessment, (4) health data, (5) family background information, (6) verified teacher, counselor, or

social worker ratings and/or observations, and (7) verified reports of serious or recurrent behavior patterns.

Category C contains temporary information such as (1) legal matters, (2) clinical findings (medical reports, psychiatric reports, and so on), (3) personality test results, (4) teacher reports, and (5) counselor reports.

We have completed the review of Category B information recently and find that there are some items of information which we want to make part of your child's permanent pupil record (Category A):

_____ Psychological Reports

_____ Supporting test data for psychological report

_____ School Health Records

_____ Teacher Observations

_____ Progress Reports

_____ Psychiatric Evaluation

_____ Supporting test data for psychiatric report

_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Language Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

We assure you that the above items will not be allowed to be used in any damaging way to you or to your child. We sincerely feel that the above items will be useful to us for assisting you in providing the best education possible for your child. The above information will never be released to anyone unless we have your permission in writing, telling us who you want the information released to.

Therefore, we would like you to sign on the bottom part of this form if you approve of making the above list of items a permanent part of your child's records. If you have any questions or disagree with any of the items, please call _____ at your convenience. You have the right to challenge or question any of the above items or any other items in your child's records, and can make an appointment with Dr. Barton B. Proger to see the contents of your child's folder.

Sincerely,

_____ _____

(Date Reviewed) (Signature of Reviewer)

_____

(Position)

I have read this form completely and understand what it means. I agree to allow the Intermediate Unit make the above items a permanent part of my child's records.

_____ _____

(Date Signed) (Signature)

Please return all pages of this form

Circle One: Parent
guardian
surrogate

TO: Dr. Barton B. Proger
Director of Pupil Records
Montgomery County Intermediate Unit
1605-B West Main Street
Norristown, PA 19401

APPENDIX D

REVIEW STAMP FOR
CATEGORY B INFORMATION

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REVIEW OF "CATEGORY C" INFORMATION

TO:

RE: Updating the Record File of the Child_____

(Category C Review Must Occur Annually and upon Leaving the Program)

We are required to review periodically the information that is contained in your child's file. The purpose of this review is to remove and destroy any items that are no longer of use to us in providing services to your child and/or that are possibly damaging to you or your child (invasion of privacy). Your child's record folder at the Intermediate Unit is divided into three areas of information: Category A, Category B, and Category C. The purpose of the present letter is to inform you of the results of our most recent review of Category C information and to ask your permission to make certain items a part of your child's permanent record folder (Category A). However, before we get into the results of our review, we want you to understand what types of information are kept in each of the three categories.

Category A contains (1) name, address, and telephone number of student, (2) name, address, and telephone number(s) of parent(s) or guardian(s) or surrogate(s), (3) birth date, (4) academic work completed, (5) academic grades, (6) standardized achievement test scores, and (7) attendance data.

Category B contains (1) scores of standardized intelligence and aptitude tests (group and individually administered), (2) interest inventory results, (3) vocational assessment, (4) health data, (5) family background information, (6) verified teacher, counselor, or

social worker ratings and/or observations, and (7) verified reports of serious or recurrent behavior patterns.

Category C contains temporary information such as (1) legal matters, (2) clinical findings (medical reports, psychiatric reports, and so on), (3) personality test results, (4) teacher reports, and (5) counselor reports.

We have completed the review of Category C information recently and find that there are some items of information which we want to make part of your child's permanent pupil record (Category A):

_____ Psychological Reports
_____ Supporting test data for psychological report
_____ School Health Records
_____ Teacher Observations
_____ Progress Reports
_____ Psychiatric Evaluation
_____ Supporting test data for psychiatric report
_____ Visual Evaluation
_____ Supporting test data for audiological
_____ Speech Evaluation
_____ Supporting test data for speech evaluation
_____ Language Evaluation
_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

We assure you that the above items will not be allowed to be used in any damaging way to you or to your child. We sincerely feel that the above items will be useful to us for assisting you in providing the best education possible for your child. The above information will never be released to anyone unless we have your permission in writing, telling us who you want the information released to.

Therefore, we would like you to sign on the bottom part of this form if you approve of making the above list of items a permanent part of your child's records. If you have any questions or disagree with any of the items, please call_____at your convenience. You have the right to challenge or question any of the above items or any other items in your child's records, and can make an appointment with Dr. Barton B. Proger to see the contents of your child's folder.

Sincerely,

(Date Reviewed) _____ (Signature of Reviewer) _____

(Position) _____

I have read this form completely and understand what it means. I agree to allow the Intermediate Unit make the above items a permanent part of my child's records.

(Date Signed) _____ (Signature) _____

Circle One: parent
guardian
surrogate

Please return all pages of this form

TO: Dr. Barton B. Proger
Director of Pupil Records
Montgomery County Intermediate Unit
1605-B West Main Street
Norristown, PA 19401

APPENDIX F

REVIEW STAMP FOR

CATEGORY C INFORMATION

Regular "B" Review (information changed to "A" status):

REVIEWED FOR
B CATEGORY
INFORMATION

Date_____

Reviewer_____

Approved as "A"_____

(Montgomery Co., PA, I.U. 23)

Modified "B" Review (information kept in "B" status):

REVIEWED FOR
B CATEGORY
INFORMATION

Date_____

Reviewer_____

Approved as "B"_____

(Montgomery Co., PA, I.U. 23)

APPENDIX E

REVIEW OF CATEGORY C INFORMATION --TRANSFER TO "PERMANENT" STATUS (CATEGORY A)

Regular "C" Review (information changed to "A" status):

REVIEWED FOR
C CATEGORY
INFORMATION

Date_____

Reviewer_____

Approved as "A"_____

(Montgomery Co., PA, I.U. 23)

Modified "C" Review (information changed to "B" status)

REVIEWED FOR
C CATEGORY
INFORMATION

Date_____

Reviewer_____

Approved as "B"_____

(Montgomery Co., PA, I.U. 23)

APPENDIX G

"MODIFIED" REVIEW FORM FOR

CATEGORY B INFORMATION -

TRANSFER TO "B" STATUS

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REVIEW OF "MODIFIED B" INFORMATION

TO:

RE: Updating the Record File of the Child_____

(Modified B Review Must Occur When Student Moves from Elementary Program to Junior High School Program and from Junior High School Program to Senior High School Program and/or upon Leaving the Program)

We are required to review periodically the information that is contained in your child's file. The purpose of this review is to remove and destroy any items that are no longer of use to us in providing services to your child and/or that are possibly damaging to you or your child (invasion of privacy). Your child's record folder at the Intermediate Unit is divided into three areas of information: Category A, Category B, and Category C. The purpose of the present letter is to inform you of the results of our most recent review of Category B information and to ask your permission to continue to hold these items in your child's folder until he or she reaches age 21, at which time the information would be destroyed.

Category A contains (1) name, address, and telephone number of student, (2) name, address, and telephone number(s) of parent(s) or guardian(s) or surrogate(s), (3) birth date, (4) academic work completed, (5) academic grades, (6) standardized achievement test scores, and (7) attendance data.

Category B contains (1) scores of standardized intelligence and aptitude tests (group and individually administered), (2) interest inventory results, (3) vocational assessment, (4) health data, (5) family background information, (6) verified teacher, counselor, or

social worker ratings and/or observations, and (7) verified reports of serious or recurrent behavior patterns.

Category C contains temporary information such as (1) legal matters, (2) clinical findings (medical reports, psychiatric reports, and so on), (3) personality test results, (4) teacher reports, and (5) counselor reports.

We have completed the review of Category B information recently and that there are some items of information which we want to continue to hold in your child's folder until he or she reaches age 21, at which time the information would be destroyed:

_____ Psychological Reports

_____ Supporting test data for psychological report

_____ School Health Records

_____ Teacher Observations

_____ Progress Reports

_____ Psychiatric Evaluation

_____ Supporting test data for psychiatric report

_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Language Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

We assure you that the above items will not be allowed to be used in any damaging way to you or to your child. We sincerely feel that the above items will be useful to us for assisting you in providing the best education possible for your child. The above information will never be released to anyone unless we have your permission in writing, telling us who you want the information released to.

Therefore, we would like you to sign on the bottom part of this form if you approve of making the above list of items a part of your child's record until age 21, at which time the items will be destroyed. If you have any questions or disagree with any of the items, please call _____ at your convenience. You have the right to challenge or question any of the above items or any other items in your child's records, and can make an appointment with Dr. Barton B. Proger to see the contents of your child's folder.

Sincerely,

_____ _____

(Date Reviewed) (Signature of Reviewer)

_____

(Position)

I have read this form completely and understand what it means. I agree to allow the Intermediate Unit make the above items a part of my child's records until he or she reaches age 21, at which time the items will be destroyed.

_____ _____

(Date Signed) (Position)

Please return all pages of this form

Circle One: parent

guardian

surrogate

TO: Dr. Barton B. Proger
Director of Pupil Records
Montgomery County Intermediate Unit
1605-B West Main Street
Norristown, PA 19401

APPENDIX H

"MODIFIED" REVIEW FORM FOR

CATEGORY C INFORMATION -

TRANSFER TO "C" STATUS

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REVIEW OF "MODIFIED C" INFORMATION

TO:

RE: Updating the Record File of the Child_____

(Modified C Review Must Occur When Student Moves from Elementary Program to Junior High School Program and from Junior High School Program to Senior High School Program and/or upon Leaving the Program)

We are required to review periodically the information that is contained in your child's file. The purpose of this review is to remove and destroy any items that are no longer of use to us in providing services to your child and/or that are possibly damaging to you or your child (invasion of privacy). Your child's record folder at the Intermediate Unit is divided into three areas of information: Category A, Category B, and Category C. The purpose of the present letter is to inform you of the results of our most recent review of Category C information and to ask your permission to continue to hold these items in your child's folder until he or she reaches age 21, at which time the information would be destroyed.

Category A contains (1) name, address, and telephone number of student, (2) name, address, and telephone number(s) of parents(s) or guardian(s) or surrogate(s), (3) birth date, (4) academic work completed, (5) academic grades, (6) standardized achievement test scores, and (7) attendance data.

Category B contains (1) scores of standardized intelligence and aptitude tests (group and individually administered), (2) interest inventory results, (3) vocational assessment, (4) health data, (5) family background information, (6) verified teacher, counselor, or

social worker ratings and/or observations, and (7) verified reports of serious or recurrent behavior patterns.

Category C conatins temporary information such as (1) legal matters, (2) clinical findings (medical reports, psychiatric reports, and so on), (3) personality test results, (4) teacher reports, and (5) counselor reports.

We have completed the review of Category C information recently and find that there are some items of information which we want to continue to hold in your child's folder until he or she reaches age 21, at which time the information would be destroyed:

_____ Psychological Reports

_____ Supporting test data for psychological report

_____ School Health Records

_____ Teacher Observations

_____ Progress Reports

_____ Psychiatric Evaluation

_____ Supporting test data for psychiatric report

_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Language Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

We assure you that the above items will not be allowed to be used in any damaging way to you or to your child. We sincerely feel that the above items will be useful to us for assisting you in providing the best education possible for your child. The above information will never be released to anyone unless we have your permission in writing, telling us who you want the information released to.

There fore, we would like you to sign on the bottom part of this form if you approve of making the above list of items a part of your child's record until age 21, at which time the items will be destroyed. If you have any questions or disagree with any of the items, please call _____ at your convenience. You have the right to challenge or question any of the above items or any other items in your child's records, and can make an appointment with Dr. Barton B. Proger to see the contents of your child's folder.

Sincerely,

(Date Reviewed) _____ (Signature of Reviewer) _____

(Position) _____

I have read this form completely and understand what it means. I agree to allow the Intermediate Unit make the above items a part of my child's records until he or she reaches age 21, at which time the items will be destroyed.

(Date Signed) _____ (Position) _____

Please return all pages of this form

Circle One: parent
guardian
surrogate

TO: Dr. Barton B. Proger
Director of Pupil Records
Montgomery County Intermediate Unit
1605-B West Main Street
Norristown, PA 19401

APPENDIX I

NOTIFICATION TO SUPERVISORS OF "B" AND "C" REVIEW FORM RETURN

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

NOTIFICATION TO SUPERVISOR OF
"B" AND "C" REVIEW FORM RETURN

FROM: Barton B. Proger, Director of Pupil Records

TO:

On_____the review form _____ of the child_____ was returned to me and has been placed in the child's file. Please make an entry to this effect in your personal log-book file folders dealing with "B" and "C" review processes. Thank you.

CONFIDENTIAL

This document is not to be duplicated or have its content revealed in any fashion. Other requests for this same document are to be forwarded to the Director of Pupil Records, Montgomery County Intermediate Unit No. 23, 1605-B West Main Street, Norristown, PA 19401

APPENDIX J

"CONFIDENTIAL" STAMP TO BE
AFFIXED TO ANY DOCUMENT
LEAVING THE INTERMEDIATE UNIT

APPENDIX K

REQUEST FOR MISSING

RECORDS FORM

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

REQUEST FOR MISSING RECORDS

Date: _____

Dear

We are currently in the midst of reorganizing our student record collections for all Intermediate Unit operations. We have a central collection in the Special Education Center and several satellite collections located in the program area facilities (e.g., Physically Handicapped Building Collection). We recently tried to locate the report of _____ from your district. This report is currently unavailable from our files and we wish to reconstruct its contents as soon as possible.

While the Intermediate Unit and the district in which the student is (or will be) enrolled can exchange records of "A" or "B" category freely. Thus, we are assuming no parental permission is necessary in this case.

Would you be so kind as to furnish us with a copy of all documents in this child's file that you received originally from the Intermediate Unit and any other documents that at one time you may have given to the Intermediate Unit? Usually the missing file turns up later (most often in a misfiled area within the thousands upon thousands of files that the Intermediate Unit maintains), but until it does the situation does not allow us to attend to the best welfare of the child.

If you have specific questions on this issue, please contact me at your convenience. Thank you for assisting us in this matter.

Sincerely,

Barton B. Proger, Ed.D.
Director of Pupil Records

BBP/jar

cc: Dr. Lester Mann

APPENDIX L

NOTIFICATION OF PARENTS OF RELEASE OF THEIR CHILD"S RECORDS

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

NOTIFICATION OF RELEASE OF
Pupil Records

Date_____

TO:

RE: Release of Your Child's Records

Dear _____:

I received a request from _____ of _____ dated _____ requesting certain records from our permanent files on your child,_____. Accompanying this request was a release-of-information form signed by _____ _____ and dated _____.

In response to the request and the release, I want you to know that on _____, I sent the following reports to_____:

_____ Psychological Reports
_____ Supporting test data for psychological report
_____ School Health Records
_____ Teacher Observations
_____ Progress Reports
_____ Psychiatric Evaluation
_____ Supporting test data for psychiatric report
_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Lanugage Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family backgound information

_____ Attendance data

_____ Crucial Correspondence relating to the child

If you wish to have a copy of the records that were sent out, please notify me in writing by specifying exactly what you want (in complete detail as it is listed above) and by signing and dating your request. If we do not hear from you, we will assume you are satisfied with the way in which we have handled this matter.

If you have any questions on what we have done or on what our procedures are, please contact me at your convenience. We will try to do everything we can to help you and your child.

Sincerely,

Barton B. Proger, Ed.D.
Director of Pupil Records

BBP/

cc:

APPENDIX M

LISTING FORM SENT TO REQUESTOR OF INFORMATION

MONTGOMERY COUNTY INTERMEDIATE UNIT
Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

LISTING OF RECORDS

Date_____

TO:

RE: Records on _____

I received a request from you dated_____ and a release of information signed by_____ regarding the records of _____. In response to your request, I am sending the following documents which are allowed under our current "Principles of Collection, Maintenance, and Dissemination of Pupil Records" (adopted August 27, 1975.)

_____ Psychological Reports
_____ Supporting test data for psychological report
_____ School Health Records
_____ Teacher Observations
_____ Progress Reports
_____ Psychiatric Evaluation
_____ Supporting test data for psychiatric report
_____ Visual Evaluation
_____ Supporting test data for audiological
_____ Speech Evaluation
_____ Supporting test data for speech evaluation
_____ Language Evaluation
_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

Besides the above records, we either possess or are aware of the following documents on this child completed by outside agencies and thus not releasible under the "Principles."

In Our Possession	Only Aware Of	
_____	_____	Psychological Reports
_____	_____	Supporting test data for psychological report
_____	_____	School Health Records
_____	_____	Teacher Observations
_____	_____	Progress Reports
_____	_____	Psychiatric Evaluation
_____	_____	Supporting test data for psychiatric report
_____	_____	Visual Evaluation
_____	_____	Supporting test data for audiological
_____	_____	Speech Evaluation
_____	_____	Supporting test data for speech evaluation
_____	_____	Language Evaluation
_____	_____	Supporting data for language evaluation

_____ _____ Physical Therapist Report

_____ _____ Occupational Therapist Report

_____ _____ Medical Report

_____ _____ Neurological

_____ _____ Samples of Student Work

_____ _____ Report Cards

_____ _____ Scores of group aptitude and achievement tests

_____ _____ Vocational skill assessment

_____ _____ Family background information

_____ _____ Attendance data

_____ _____ Crucial Correspondence relating to the child

For the above-mentioned "outside agency" reports, we request that you contact the appropriate agency; we are not legally allowed to release such information.

We hope the items we are enclosing are helpful in providing appropriate programing and services for this child. If you have any questions on this child's records or on our procedures, please contact me. We will do everything possible to assist the parents and you in providing for the child.

Sincerely,

Barton B. Proger, Ed.D.
Directof of Pupil Records.

Enclosures

cc: Dr. Mann

APPENDIX N

FORM USED TO INDICATE REASON FOR INABILITY TO COMPLY WITH REQUEST FOR INFORMATION

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

Date_____

TO: Person Who Has Requested Release of and/or Transfer of Student Records

FROM: Dr. Barton B. Proger, Director of Pupil Records

RE: Inability of Intermediate Unit to Comply At This Time

Name of Person Making Request_____

Affiliation and Address_____

_____

_____

Dear_____:

I have received your request dated _____ for release and/or transfer of the student records of _____ to _____. As of September 2, 1975, we are required by the Commonwealth of Pennsylvania to abide by the Montgomery County Intermediate Unit's "Principles of Collection, Maintenance, and Dissemination of Pupil Records," which were adopted as a legally binding contract by motion of the Intermediate Unit Board of School Directors at their Meeting of August 27, 1975. For one or more of the following reasons, we cannot release or transfer the student records concerned in your request. In an effort to safeguard the rights of privacy of the student and his parents, guardians, or surrogates, we are forced to await a newly submitted request from you.

_____ Parental release submitted to us does not specify the categories of information desired; ask parents to complete attached form

_____ Parental release submitted to us incomplete; ask parents to complete all relevant parts of attached form, especially _____

_____ No parental release supplied to us; we require such releases due to frequent intermingling of Classes A, B, and C information so as to meet legal requirements surrounding Class C data; see attached form

APPENDIX O

FORM USED BY

REQUESTOR TO OBTAIN

PARENTAL RELEASE OF

INFORMATION

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

RELEASE OF INFORMATION

Dr. Barton B. Proger
Director of Pupil Records
Montgomery County Intermediate
Unit, #23
Special Education Center
1605-B West Main Street
Norristown, PA 19401

Dear Dr. Proger:

I hereby grant to you permission to release the following information to _____

concerning the child _____.

(Check whichever items you are willing to have us send)

_____ Psychological Reports

_____ Supporting test data for psychological report

_____ School Health Records

_____ Teacher Observations

_____ Progress Reports

_____ Psychiatric Evaluation

_____ Supporting test data for psychiatric report

_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Language Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

I understand that I am consenting to the release of this information to be used only in a professional fashion by the person who has requested it.

Date _____ Signed _____

Relationship to child:

☐ parent

☐ legal guardian

☐ surrogate

APPENDIX P

PARENT CONFERENCE LISTING

OF OUTSIDE AGENCY DOCUMENTS

MONTGOMERY COUNTY INTERMEDIATE UNIT
Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

EXAMINATION OF PUPIL

RECORDS BY PARENTS

You have asked to see your child's record folder. We are required by the state of Pennsylvania to abide by confidentiality guidelines which became effective September, 1975. Because of those guidelines, we are not allowed to show any person a record that was produced by outside sources. However, in an effort to assist you, we are listing below the documents we have (date, who wrote it, and where it can be obtained).

_____ Psychological Reports

_____ Supporting test data for psychological report

_____ School Health Records

_____ Teacher Observations

_____ Progress Reports

_____ Psychiatric Evaluation

_____ Supporting test data for psychiatric report

_____ Visual Evaluation

_____ Supporting test data for audiological

_____ Speech Evaluation

_____ Supporting test data for speech evaluation

_____ Language Evaluation

_____ Supporting data for language evaluation

_____ Physical Therapist Report

_____ Occupational Therapist Report

_____ Medical Report

_____ Neurological

_____ Samples of Student Work

_____ Report Cards

_____ Scores of group aptitude and achievement tests

_____ Vocational skill assessment

_____ Family background information

_____ Attendance data

_____ Crucial Correspondence relating to the child

Sincerely,

Barton B. Proger, Ed.D.
Director of Pupil Records

BBP/

cc: Dr. Mann

MONTGOMERY COUNTY INTERMEDIATE UNIT
Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

October 23, 1975

TO: Intermediate Unit Staff Members

FROM: Barton B. Preger, Director of Pupil Records

RE: Release of Information in a Routine, On-Going Manner to the Same Individual (Update No. 2)

On Wednesday, October 22, 1975, Mr. Boardman brought to my attention operational problems surrounding the above topic of confidentiality. I will first briefly outline the situation which all of you will be meeting sooner or later. If your staff finds it necessary to communicate with a private physician (or any other private agencies) of the parents' choice, whereby such communication will occur frequently throughout the school year in a routine manner (such as having had the parents request us to send progress reports to their own physician), then we would appear to be in conflict with Section IV on Page 15 of the Principles of Collection, Maintenance, and Dissemination of Pupil Records if we tried to use only one release to cover an extended time period. Literally, we should be obtaining new specified releases for every time you were requested to send information on a continuing basis to a person of the parents' choice; the paperwork would become even more horrendous than it is now. I believe certain individuals on our staff (such as social workers, O.T.s, P.T.s) will have to verbally and/or in writing communicate with such individuals on a continuing basis either out of Intermediate Unit necessity or by parental desire.

The procedure to be used is as follows. If you can assure yourself that the individual to whom you plan to release information in accord with the confidentiality guidelines is definitely under the control of the parents (such as a physician of their choice), then a single specified release of the type we have been discussing since September, 1975, would be sufficient, with the following extra stipulations. First, the method of communication should be stipulated as "either in writing or verbally." Second, the time frame of reference should be specified as "during the 1975-1976 school year." (The latter provision is what appears to violate on the surface Section IV of Page 15 of the confidentiality policy, but this has been firmly determined to not have been the intent of the original confidentiality guidelines.) Of course, the categories of information still must be specified in the release in the usual way (such as educational progress reports, physical therapy progress reports, behavioral progress reports). Clearly, look ahead to

various phases of your planned ongoing contact with the individual in question (such as the physician). Only upon receipt of this single release can you then begin to correspond verbally or in writing with the given individual in a continuing fashion. Once such approval is obtained, I do not have to be involved in the actual release of documents. Just make sure that the parent form (Appendix L) is mailed and also put in the child's folder.

The above procedure was cleared Wednesday evening (October 22, 1975) with Mr. Philip Salkin, Board Solicitor, and is said to be in keeping with the intent of Section IV of Page 15. (However, it should be noted that if the person to whom information is to be released is not under the direct control of the parents, then a separate release must be obtained for every occurence of release of information, albeit to the same person or agency).

Finally, I want to reiterate the already existing procedure whereby in the usual, once-and-done releases to schools and agencies (other end-of-year progress reports or similar exchanges that are sent on all children as a routine procedure) should be processed by me. Please note that the new procedure described in this update pertains only to continuing contacts and not to the usual once-and-done releases.

Should you have any questions, phone me at your convenience and I shall respond immediately to specific situations. Thank you for your cooperation.

cc: Dr. Harken
Dr. Mann
Mrs. Rokos

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

November 3, 1975

TO: All Professional Members

FROM: Barton B. Proger, Director of Pupil Records

RE: Annual Review Procedures for Student Records (Update #3 on Confidentiality)

As all of you are aware, the confidentiality guidelines require that Category C information be reviewed on an annual basis to determine whether the information will be destroyed or shall be kept (the latter with parental permission). Further, you are also aware of the fact that Category B information must be reviewed at major milestones in the child's educational career (changing from elementary school to junior high school, changing from junior high school to senior high school, transferring to a different school system, dropping out, or graduating). In both of these categories of information, we went over briefly during our in-service meetings the procedures that could be used in conducting this review process. You will recall that in the "Operational Guidelines for the Department of Pupil Records," there were a series of forms contained in Appendices C through H. These forms would seem to take care of almost any need of Intermediate Unit staff to review student documents as per the above schedule.

In a meeting of October 16, 1975, with Mr. Salkin, Intermediate Unit Board Solicitor, we discussed several issues surrounding student record collections in general and confidentiality procedures in particular. One of the crucial topics that was brought up by me in questioning was exactly what time frame of reference do the confidentiality guidelines pertain to. First of all, it should be noted that the review process for Categories B and C is not retroactive and thus we do not need to concern ourselves about the students who are inactive in our central record collection. The question then arises as to when a document was inserted into an active child's folder. Fortunately, as I had hoped, Mr. Salkin agreed that only those documents that are made part of the child's record folder after September 2, 1975, are subject to the review process. This means that if you have a very thick folder on a currently active child, you probably do not have to review the bulk of it, but only the newly inputted documents of the current school year. This greatly reduces the amount of work that is expected of a supervisor who is charged with the responsibility of reviewing student record folders.

I have been discussing the specific implementation of what the above facts mean for the review process with several people over the past few days. In one such conversation, Mr. Potter and I evaluated the potential of a checklist scheme for keeping track of what documents of Category B and Category C were inputted during the present school year (and for each school year in the future). The checklist method holds great potential for further reducing the

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

work associated with the review process. I am therefore asking that as of this time forward each student record collection area should keep a checklist of all students who have had new papers entered during the present school year by name and by category of information (see attached appendix Q). The attached form is put forth as an example for all active student record collection people to follow. Each program should examine this form carefully for missing items; I shall assume these forms to be in operation effective immediately. Staff members who are placing new documents into any active folder should always make it a practice henceforward to record on this checklist what has been put into the folder. If all staff members abide by this operating policy, the review process will be greatly simplified and would not seem to pose a great burden to any particular staff member. A supervisor who plans to review active student folders at the end of the current year could begin by looking at the checklist to see which students were affected by the input of new documents. After reviewing carefully those documents on the checklist, the supervisor could then quickly leaf through all his children's folders to look for other documents dated September 2, 1975, or later that may not have been listed on the checklist.

I want to point out that the form letters that were devised for the purpose of review procedures will probably receive some degree of equal usage. The regular B review and C review forms both attempt to obtain permission from the parent to move information up to the status of Category A (that is, for permanent retention). Generally, I would encourage the use of the regular review form if for no other reason than that once in Category A, it is never to be subject to review paperwork again. However, if you anticipate that parents would be reluctant in specific situations to allow a document to be permanently stored in our record system, then the modified Category B review form and modified Category C form were devised to specify the period of time retention as only until age 21. (Please note that if you choose the latter course, and if the parents agree to it, then this document need not be reviewed again until the child reaches age 21.)

As I have mentioned several times in the past during in-service meetings on confidentiality, the review process can be simplified to some extent by using a "canned" version of the four review forms. In particular, if in spite of the checklist procedure described above for keeping track of only the new documents that are entered into a child's folder, the program director and supervisors still feel the amount of paperwork will be overwhelming, then they could elect to systematically check off the same items on the four review forms (Appendices C through H) and send out the same review form to all parents. In other words, the program supervisors would not actually look at the specific documents, but would assume the same types of documents to exist in all children's folders. I would tend to discourage this "canned" procedure in that I still feel the previously described options are quite viable. However, please be aware that this proceudre will be legal.

Finally, I wish to emphasize the importance of all staff members in the Intermediate Unit operating from a common basis of understanding of what types of documents are of Category A, Category B, or

Category C Status. Appendix Q, attached to this memorandum, embodies in it the usual interpretation of the most common documents. I would encourage you to treat the listed types of documents as though they were belonging to the Category level which they are placed under. Items have come to my attention over the past few weeks that some staff members looking at the same type of document do not agree as to the Category to which that document belongs. There will, of course, be exceptions to where a document is placed as opposed to the form placement in Appendix Q; these cases are to be dealt with on an individual basis, and perhaps the safest thing to do will be to give me a call to clarify the situation. (For example, we normally would like to interpret psychological evaluations as Category B, presuming the personality observations and behavioral comments are kept very minimal; however, if the latter considerations would become a major part of the report, then the document clearly should be considered as Category C). Staff members should consult the checklist form to see what documents are typically found in each of the three categories of information. In this way, we will all be on the same understanding.

There are decisions which will be difficult at times a what constitutes a document under Category A, Category B, or Category C. The attached appendix should assist in this process in most decisions. However, whenever a document is loaded with a lot of Category C data, even though it may normally be considered a Category B type of document, then you should automatically consider the document to be of Category C status. A question that also will come up as you attempt to implement the use of Appendix Q that is attached is the difference between a verified and unverified document. For instance, when is a teacher anecdotal of an incident considered to be verified? If another school official of either district or Intermediate Unit nature witnessed the incident, then I think there is no doubt that once that persons signature is obtained upon the document along with the date of signing, that this would be considered a verified document. On the other hand, if only the person who is writing the "unverified" document actually saw an incident or certain type of behavior occur, then I think there is no other recourse but to consider that document as being of unverified nature. Therefore, the latter type of document will normally be considered to be of Category C status. There is a distinction to be made in this particular situation between verification and the entry of any document at all into the file. The near fact that a supervisor must sign anecdotal reports and teacher observations before they can be entered into a child's file does not mean that the content of this document is considered verified. If an Intermediate Unit staff member wishes to turn a teacher observation or anecdotal record into "verified" status, he must have a witness to that event sign off on the document itself and dated and put the words "verified by" in the same place. The normal supervisory signature for merely entering a document into a file simply means that the admission of that document into that file has been approved by the supervisor. Whenever supervisors are signing off for the latter purpose, they should place the words "approved for admission into file" with their signature and date. This may seem like hair splitting, but should a document ever be needed as evidence in a legal proceeding, then we must have a clear indication as to what the second person's signature meant (verification or simply admissibility approval). Should there be any specific questions on what constitutes a verified and unverified report, they should be addressed to me immediately.

Finally, I recommend that no review of student records be completed until near the end of the current school year unless you are absolutely sure that no new documents will be placed into a given child's folder. If you know that only very routine documents (such as annual progress reports) are to be placed in the student folder, then you can probably complete the review process for such children even ahead of the final inclusion of documents. Otherwise, I believe it would be risky for any staff member to engage in any written correspondence with the parent during the middle of the year and possibly be forced to come back a second time at the very end of the year.

Should you have any questions on any of the procedures associated with the review process, please feel free to contact me. Thank you for your cooperation.

Attachment

cc: Dr. Harken
Dr. Mann
Dr. Leiss
Mrs. Anderson
Mr. Boardman
Mary Jane Butler
Delores Faust
Nancy McLain
Ann Marie Rokos
Ginny Schoenberger
Mary Chantry
Sylvia Katrina
Peggy Flenders
Betty Hohl
Mary Lou Mitchel
Mrs. Sames

APPENDIX Q

STUDENT FOLDER INPUT CHECKLIST

Name	
	Name and Address
	Birth Date
	Curric. outline
	Teachers grades
	Stand. Ach. Test scores
	Attend.Data
	Intel and Apt. Test scores
	Vocat'. Asses.
	Health data
	Med. data
	Demographic Fam. Bkgrd.
	Verified Obsvt.and Anectl. reports
	Ed'l Eval
	Lang.Eval.
	Psych. report eval
	Tchr.Prog. report
	Aud. Eval
	Vis. Eval
	Corresp. (non-personality)
	Student work smpls

Category A

Category B

Category C

																		Unverified observt. and Anedt. report
																		Soc. Wkr. Rept.
																		Psych. Eval
																		Psychiat. Eval.
																		Personality test results
																		Legal Findings
																		Clinical Fdgs.
																		Guidance Couns. report
																		Correspondence (personality int)

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

November 4, 1975

TO: Dr. Goodman, Mrs. Anderson, Mr. Towne, Mr. Boardman, Mr. Potter, Mrs. McBride, Mr. Siegel, Dr. Leiss, Dr. Fischman

FROM: Barton B. Proger, Director of Pupil Records

RE: Representational Consent Forms for 1975-1976 (Confidentiality update #4)

As you are aware, when we first began discussion about confidentiality with individual staff members and during group in-service sessions, we described the purpose and nature of the Representational Consent Forms that were to be sent out to all parents of children in our own programs. I am reminding each of you that you should have been processing the mailing of these requests in your individual program for the 1975-1976 school year. The forms were contained in the confidentiality policy that Dr. Fischman and Mrs. Bilker put together (not in the "Operational Guidelines" booklet that I put together). If you look at the document entitled, "Principles of Collection, Maintenance, and Dissemination of Pupil Records," you will find the representational consent forms for the various programs. I am requesting that if you have not already done so, please get your representational forms out to your parents as soon as possible. For those that are still in the process of mailing out these forms, I caution you that you must use without any alterations the forms that were attached to the "Principles" document of Dr. Fischman and Mrs. Bilker. The reason for this stipulation is that the forms were approved at the August 27, 1975, Intermediate Unit Board meeting and therefore cannot be altered without resubmission to the Board. It is important that you get these forms out as soon as possible if there are any children left to be done yet. I think we will still be in time, relatively speaking, with regard to the long-range schedule for this year, considering that this is the first year and that there are a lot of growing pains associated with it.

There are only two major types of procedure that have been designed. One procedure concerns the self-contained class and resource-room operation. The procedure here is nothing more then to send out the form letter for your particular program for all children that are involved in either of these types of placements. The second procedure concerns the itinerant services. Because the largest program in this regard is that of speech and hearing, a few words on how this situation was handled should serve as a model for any future questions in this regard. It was decided that the requirements of confidentiality would be met if the routine mass

SPECIAL EDUCATION-BLUE LINE COMMUNICATION

screening process in kindergarten and first grade could be assumed under the district representational consent forms. (That is, the testing was done at the request of the district, and in turn the districts are responsible for taking care of all necessary paperwork.) However, if any of those children who were to be initially screened would be in an Intermediate Unit Special Education Program, then an exception was made and the representational consent form was sent out by us. For more detailed testing (that is, followup on potential candidates identified in screening), the representational form of the Intermediate Unit speech and hearing program was then sent out to the parents of such children; however, it is still considered to be routine, necessary testing and not of the heavier, diagnostic type which would normally require an individual consent form. This, then, was the manner in which the itinerant requests were handled.

For those of you who are still wondering exactly how the representational consent procedure is implemented, the letter for your program which was contained in the "Principles" of Dr. Fischman and Mrs. Bilker, should be retyped on a master stencil and have Dr. Harken's signature placed upon it. After obtaining his signature, the letter can then be duplicated and sent out as appropriate. This should be all that there is to the procedure of representational consent.

Should there be any questions on these final details of the representational process in Montgomery County Intermediate Unit, please contact me.

cc: Dr. Harken
Dr. Mann
Ann Marie Rokos
Mary Jane Butler
Delores Faust
Nancy McLain
Ginny Schoenberger
Mary Chantry
Sylvia Katrina
Peggy Flenders
Betty Hohl
Mary Lou Mitchel
Mrs. Sames

MONTGOMERY COUNTY INTERMEDIATE UNIT
Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

November 4, 1975

TO: Dr. Goodman, Mrs. Anderson, Mr. Towne, Mr. Boardman, Mr. Potter, Mrs. McBride, Mr. Siegel, Dr. Leiss, Dr. Fischman

FROM: Barton B. Proger, Director of Pupil Records

RE: Representational Consent Forms for 1975-1976 (Confidentiality update #4)

As you are aware, when we first began discussion about confidentiality with individual staff members and during group in-service sessions, we described the purpose and nature of the Representational Consent Forms that were to be sent out to all parents of children in our own programs. I am reminding each of you that you should have been processing the mailing of these requests in your individual program for the 1975-1976 school year. The forms were contained in the confidentiality policy that Dr. Fischman and Mrs. Bilker put together (not in the "Operational Guidelines" booklet that I put together). If you look at the document entitled, "Principles of Collection, Maintenance, and Dissemination of Pupil Records," you will find the representational consent forms for the various programs. I am requesting that if you have not already done so, please get your representational forms out to your parents as soon as possible. For those that are still in the process of mailing out these forms, I caution you that you must use without any alterations the forms that were attached to the "Principles" document of Dr. Fischman and Mrs. Bilker. The reason for this stipulation is that the forms were approved at the August 27, 1975, Intermediate Unit Board meeting and therefore cannot be altered without resubmission to the Board. It is important that you get these forms out as soon as possible if there are any children left to be done yet. I think we will still be in time, relatively speaking, with regard to the long-range schedule for this year, considering that this is the first year and that there are a lot of growing pains associated with it.

There are only two major types of procedure that have been designed. One procedure concerns the self-contained class and resource-room operation. The procedure here is nothing more then to send out the form letter for your particular program for all children that are involved in either of these types of placements. The second procedure concerns the itinerant services. Because the largest program in this regard is that of speech and hearing, a few words on how this situation was handled should serve as a model for any future questions in this regard. It was decided that the requirements of confidentiality would be met if the routine mass

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screening process in kindergarten and first grade could be assumed under the district representational consent forms. (That is, the testing was done at the request of the district, and in turn the districts are responsible for taking care of all necessary paperwork.) However, if any of those children who were to be initially screened would be in an Intermediate Unit Special Education Program, then an exception was made and the representational consent form was sent out by us. For more detailed testing (that is, followup on potential candidates identified in screening), the representational form of the Intermediate Unit speech and hearing program was then sent out to the parents of such children; however, it is still considered to be routine, necessary testing and not of the heavier, diagnostic type which would normally require an individual consent form. This, then, was the manner in which the itinerant requests were handled.

For those of you who are still wondering exactly how the representational consent procedure is implemented, the letter for your program which was contained in the "Principles" of Dr. Fischman and Mrs. Bilker, should be retyped on a master stencil and have Dr. Harken's signature placed upon it. After obtaining his signature, the letter can then be duplicated and sent out as appropriate. This should be all that there is to the procedure of representational consent.

Should there be any questions on these final details of the representational process in Montgomery County Intermediate Unit, please contact me.

cc: Dr. Harken
Dr. Mann
Ann Marie Rokos
Mary Jane Butler
Delores Faust
Nancy McLain
Ginny Schoenberger
Mary Chantry
Sylvia Katrina
Peggy Flenders
Betty Hohl
Mary Lou Mitchel
Mrs. Sames

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

November 3, 1975

TO: Supervisors, Psychologists, and Social Workers

FROM: Barton B. Proger, Director of Pupil Records

RE: Copy of "Operational Guidelines" for implementation of Confidentiatlity (Update #5)

During the in-service meeting at which we discussed confidentiality before all staff members, and during later, more specialized in-service meetings with particular program area staff, we made use of booklets that I prepared for confidentiatlity which were in many cases not legible enough because of xerox problems at the time. I am therefore enclosing a clear copy of the confidentiality guidelines and forms that are to be used in implementing the process. I encourage you to keep this final bound booklet for ready reference and to consult it particularly with regard to the paperwork that is needed when processing the release requests that fall into your own domains. At the same time, please realize that Karen Stafford will have a booklet identical to the one which you have now received and can therefore run off multiple copies of any form that you feel you need a supply of. From henceforward, we want each of you to generate your own copies of each form that is to be used in the implementation of confidentiality. I would recommend that when you need a supply of any given form, you submit a duplication request of the usual variety to Karen, specifying under other directions" what form you wish to be duplicated in terms of the Appendix letter and attach the word confidentiality to that letter (e.g., confidentiality appendix M). Karen will then be able to refer to her own master copy of the confidentiality booklet and reproduce the appropriate number of forms for you.

I want to re-emphasize the cruciality of keeping copies of any paperwork associated with the release of information. You must <u>at the minimum</u> always send a notification form to the parent (Appendix L) whenever a document is sent anywhere. A copy of appendix L should be placed in the child's folder, as well as a copy kept for your own file. There will be times when the person who was suppose to receive the document will notify us later to the effect that the document never arrived. We want to be able to check both in the child's folder and in your own personal file as to what apparently did occur in such situations. For those releases that I am currently processing, we have always made it a policy of maintaining a file of every form that has been filled out concerning a release of information for our own records, as well as inserting a copy of such correspondence in the child's file, along with a copy of the same documents to the immediate supervisor of that class. This may seem like excessive paperwork, but we feel that it is necessary to allow us to maintain accountability of this important topic of confidentiality.

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Finally, I wish to re-explain the distinction between releases which you are allowed to process and releases which I am suppose to process. Generally, I want to process personally for the time being all releases that are of a unique, once-and- done nature; that is, if a specific child's documents are being asked for (such as in transferring to a different district, or extra help is being asked for MH/MR), then I consider that to be a very specific, unique situation of release of information. All such releases are to come to me when they are of this variety. However, if at the end of a year a program is processing mass release of documents (such as copies of progress reports to districts), then I do not want to get involved in such releases. Any mass type of release of a common category of information is something which I feel is best handled at the program level by the supervisors, itinerants, therapists, or other appropriate personnel in that program. I realize that the fact that we are asking you to hand over releases that you would have ordinarily processed in the past may seem an unnecessary step, but we feel that the only way during this first year of the implementation of confidentiality that we can guarantee compliance with the many provisions in that set of regulations is to have the unique releases centrally controlled. I hope that all of you are abiding by this process. Should you have any questions on whether or not you should be processing any type of release as the situation comes up, please call me at once and we can resolve it on the spot. For those releases that you are allowed to process (that is, only mass releases), we require that you use the form in the booklet that is attached to this memo, unless you obtain permission from me to make any modification in those forms.

Thank you for your cooperation.

cc: Karen Stafford
Ann Marie Rokos
Mary Jane Butler
Delores Faust
Nancy McLain
Ginny Schoenberger
Mary Chantry
Sylvia Katrina
Peggy Flenders
Betty Hohl
Mary Lou Mitchel
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MONTGOMERY COUNTY INTERMEDIATE UNIT
Special Education Center
1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

November 10, 1975

TO: All Staff Members

FROM: Barton B. Proger, Director of Pupil Records

RE: Appendix R for Use by Director of Pupil Records in Following Up on Invalid Releases (Confidentiality update #6)

As you are aware, in the course of processing a large number of releases, there are several instances in which the initially submitted releases are inappropriate (usually because they are of "blanket-type" structure and do not specify the categories of records desired). What we do in a case such as this is to send out Appendix N with a copy of Appendix O so as to facilitate the prompt receipt of a more properly completed release from the child's guardian. However, in checking over recently the inappropriate releases that we had been holding in abeyance until a new release had been submitted to us, I find that some of the initial requestors are not responding quickly enough to our "Inability to Comply with Release Request". Therefore, I feel it necessary to devise yet another form to expedite matters in this very special situation. Appendix R is the result, and I would anticipate that only I will be using this form. However, I wish each of you to be aware of this form's existence and the purpose for which it is designed. You will at least know that we are attempting to follow-up a second time on cases where the requestor had difficulty in providing us with an appropriate release.

This update to the confidentiality procedures should be filed with your other papers and booklets on this topic so that you will be aware of the current status at all times of the confidentiality topic. If you have any questions, please contact me.

cc: Dr. Harken
Dr. Mann
Mrs. Rokos
Mrs. McLane
Mrs. Katrina
Mary Chantry
Peggy Flenders
Ginny Schoenberger
Mary Jane Butler
Betty Hohl
Mary Lou Mitchel
Mrs. Sames
Delores Faust

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APPENDIX R

REMINDER FORM FOR PEOPLE

WHO REQUESTED RECORDS BUT WERE

REJECTED BECAUSE OF INAPPROPRIATE

RELEASE

MONTGOMERY COUNTY INTERMEDIATE UNIT

Special Education Center

1605-B WEST MAIN STREET, NORRISTOWN, PENNSYLVANIA 19401 PHONE 215-539-8550

Date: _____

TO:

FROM: Dr. Barton B. Proger, Director of Pupil Records

RE: Reminder on Pending Release of Records

On _____ I received a request for records on one of our students, _____. Accompanying this request was a release form dated _____ and signed by _____. As I notified you on _____, that release was inappropriate, usually because it did not specify the categories of information desired. With that notification, I enclosed a new release form for you to send to the parents. I have not received that new release to date and therefore am sending you this reminder. It is possible you never received the initial notification for one of many reasons.

I am enclosing a new copy of the release form if you still hope to receive the documents you requested earlier. I would appreciate it if you would forward this release to the parents with whatever explanation you feel appropriate at this point; the parents are to sign and date the release and are to mail it directly back to me. If, on the other hand, you see no reason to carry this matter any further, then please sign this form below and return the entire form to me as soon as possible. I will then be able to close the paperwork out on this issue.

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Thank you for your cooperation. Should you have any further questions, please feel free to contact me at your convenience.

I no longer wish to obtain these records. Please consider our request inactive from this point onward.

_____ _____

(Child's Name) (Signed)

_____

(Date)

Enclosures

cc: